

EXHIBIT D



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Purdue Pharma L.P.
One Stamford Forum
201 Tresser Boulevard
Stamford, CT 06901

Invoice Number: **3380165**
Invoice Date: **3/26/2021**
Client Number: **395187**
Matter Number: **395187.60001**

Client File No.: 20190002679

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH February 28, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
01/06/21	A. Kramer	E-mail exchange with C. Ricarte re Kaufman Boorgest (QBE) letter re [REDACTED]	0.20	1,190.00	238.00
01/08/21	A. Kramer	Communications with Ricarte re response to Board questions re [REDACTED]	0.60	1,190.00	714.00
01/13/21	A. Kramer	Communications with Ricarte and Aleali re [REDACTED]	0.60	1,190.00	714.00
01/14/21	A. Kramer	Webex re [REDACTED] with Ricarte and Aleali	0.40	1,190.00	476.00
01/14/21	A. Kramer	Revise responses for [REDACTED]	0.30	1,190.00	357.00
01/15/21	A. Kramer	Telephone conversation with C. Ricarte re [REDACTED]	0.30	1,190.00	357.00
01/18/21	A. Kramer	Communications with Ricarte, Aleali, Lowne et al. re responses to questions re [REDACTED]	0.40	1,190.00	476.00
01/18/21	A. Kramer	Work on responses to questions re [REDACTED]	1.10	1,190.00	1,309.00
01/20/21	A. Kramer	Telephone conversation with [REDACTED]	0.40	1,190.00	476.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		C. Ricarte re [REDACTED]			
Totals			4.30		5,117.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	4.30 hrs @ \$	1,190.00 / hr	5,117.00
Total Professional Services			5,117.00

INVOICE SUMMARY

Fees	\$	5,117.00
Less 10% Fee Discount	\$	(511.70)
Total Fees	\$	4,605.30
TOTAL CURRENT INVOICE DUE	\$	4,605.30
Total Amount Due	\$	4,605.30



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Invoice Number: **3380253**
Invoice Date: **3/26/2021**
Client Number: **395187**
Matter Number: **395187.60002**

Client File No.: 20190002678

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH February 28, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
02/05/21	A. Kramer	Canada Status Call with Ricarte, Robertson and Stikeman	0.30	1,190.00	357.00
02/05/21	L. E. Simmonds	Transmit new claims to Marsh for February 2021 notice to Tower.	0.50	265.00	132.50
Totals			0.80		489.50

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	0.30 hrs @ \$	1,190.00 / hr	357.00
Lianna E. Simmonds	0.50 hrs @ \$	265.00 / hr	132.50
Total Professional Services			489.50

INVOICE SUMMARY

Fees	\$	489.50
10% Fee Discount	\$	(48.95)
Total Fees	\$	<u>440.55</u>

TOTAL CURRENT INVOICE DUE \$ 440.55

Total Amount Due \$ 440.55



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Invoice Number: **3380292**
Invoice Date: **3/26/2021**
Client Number: **395187**
Matter Number: **395187.60004**

Client File No.: 20190002676

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH February 28, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
02/02/21	L. E. Simmonds	Contact S.D.NY Bankruptcy Court re Motion for Pro Hac Vice.	2.30	265.00	609.50
02/02/21	L. E. Simmonds	Draft Claims Cover Notice and make final Counsel Cover Notice.	0.30	265.00	79.50
02/02/21	A. Kramer	Begin review of insurance terms for Plan from Z. Levine	0.30	1,190.00	357.00
02/03/21	A. Kramer	Revise/comment on draft insurance provisions in Plan	0.70	1,190.00	833.00
02/03/21	P.E. Breene	Review insurance provisions of plan; review model plans and insurance neutrality provisions; call with client, Kramer and DPW lawyers re insurance provisions.	3.50	1,160.00	4,060.00
02/03/21	A. Kramer	Review draft insurance provisions in Plan, Imerys and Takata plans re insurance	2.70	1,190.00	3,213.00
02/03/21	A. Kramer	Conference call with C. Ricarte, R. Aleali, Z. Levine, S. Massman, C. Robertson and Breene re insurance provisions in Plan	1.00	1,190.00	1,190.00
02/03/21	A. Kramer	Communications with Ricarte re draft insurance provisions in Plan,	0.40	1,190.00	476.00



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Date	Timekeeper	Description	Hours	Rate	Amount
02/04/21	L. E. Simmonds	Create chart for domestic insurers to notice via mail and chart for domestic insurers to serve via Department of Financial Services for Prime Clerk. Confirm all addresses for service.	1.00	265.00	265.00
02/07/21	A. Kramer	E-mail exchange with Ricarte and Breene re [REDACTED] request	0.30	1,190.00	357.00
02/08/21	A. Kramer	email exchange with Ricarte re message to committees re [REDACTED] waiver request	0.20	1,190.00	238.00
02/09/21	M.J. Venditto	Confer with Ann Kramer regarding question from Ricarte regarding waiver requests	0.20	1,160.00	232.00
02/09/21	A. Kramer	email exchanges with Ricarte, Venditto and Breene re [REDACTED] waiver request	0.20	1,190.00	238.00
02/10/21	A. Kramer	Review/analyze draft insurance terms from Massman	0.80	1,190.00	952.00
02/10/21	M.J. Venditto	Review and analysis of insurance policy provisions in draft of Debtors' proposed plan	1.00	1,160.00	1,160.00
02/10/21	M.J. Venditto	Confer with Ann Kramer regarding revisions to insurance policy provisions drafted by Debtors for inclusion in plan	0.20	1,160.00	232.00
02/10/21	A. Kramer	email exchange with Massman and Levine re insurance related terms in Plan documents	0.20	1,190.00	238.00
02/10/21	E. F. Vieyra	Coordinate with S. Massman	0.20	540.00	108.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		(DPW) regarding policy analysis chart.			
02/10/21	A. Kramer	Telephone conversation and e-mail exchange with C. Ricarte re conflict waiver issues	0.30	1,190.00	357.00
02/10/21	A. Kramer	Conference call with Massman and Levine re insurance issues in Plan documents	0.70	1,190.00	833.00
02/11/21	M.J. Venditto	Analysis of workers' compensation insurance issues	0.60	1,160.00	696.00
02/11/21	M.J. Venditto	Review documents from Lisa Szymanski relating to service of process on defendants in Bermuda	0.30	1,160.00	348.00
02/11/21	M.J. Venditto	Confer with Ann Kramer regarding workers compensation insurance issues	0.20	1,160.00	232.00
02/11/21	M.J. Venditto	Review and respond to email received from Lisa Szymanski regarding requirements for service upon Bermudian insurance companies	0.20	1,160.00	232.00
02/11/21	P.E. Breene	Review materials sent by DPW re insurance provisions in plan.	1.00	1,160.00	1,160.00
02/11/21	A. Kramer	Telephone conversation with M. Venditto re insurer call, insurance provisions in plan	0.10	1,190.00	119.00
02/11/21	A. Kramer	Communications with M. Venditto re WC insurance issues for Plan	0.20	1,190.00	238.00
02/11/21	A. Kramer	Communications with S.	0.40	1,190.00	476.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Massman re insurance implications of Effective Date Cash definition			
02/11/21	A. Kramer	email exchanges with A. Pries and R. Shore re [REDACTED] waiver issue	0.80	1,190.00	952.00
02/11/21	A. Kramer	Telephone conversation with C. Ricarte re insurer conference call, insurance provisions in plan etc	0.30	1,190.00	357.00
02/12/21	M.J. Venditto	Review draft of plan provisions relating insurance policies and claims	0.50	1,160.00	580.00
02/12/21	M.J. Venditto	Confer with Ann Kramer regarding treatment of insurance policies and claims in draft plan	0.40	1,160.00	464.00
02/12/21	A. Kramer	Conference call with P. Breene and M. Venditto re insurance provisions in plan	0.40	1,190.00	476.00
02/12/21	P.E. Breene	Review materials sent by DPW re insurance provisions in plan; Provide comments on DPW Plan language; Call with DPW, Kramer, Venditto, and client.	2.50	1,160.00	2,900.00
02/12/21	A. Kramer	Communications with M. Venditto re WC insurance and other insurance issues in Plan	0.60	1,190.00	714.00
02/12/21	A. Kramer	Follow up email exchange with Massman et al re insurance provisions in plan	0.30	1,190.00	357.00
02/12/21	A. Kramer	Prepare for conference call with DPW and client re insurance provisions in plan	1.50	1,190.00	1,785.00
02/12/21	A. Kramer	Follow up call with Ricarte re	0.60	1,190.00	714.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		conference call with Ricarte, Aleali, Massman, Levine, Breene and Venditto re insurance provisions in plan			
02/12/21	A. Kramer	Conference call with Ricarte, Aleali, Massman, Levine, Breene and Venditto re insurance provisions in plan	0.80	1,190.00	952.00
02/12/21	M.J. Venditto	Participate in telephone conference call with Davis Polk (Zachary Levine and Stephanie Massman) and Debtor (Roxana Aleali and Christina Ricarte) to review insurance issues in draft of plan	1.10	1,160.00	1,276.00
02/19/21	M.J. Venditto	Confer with A. Kramer regarding coordination of adversary proceeding management and plan	0.20	1,160.00	232.00
02/20/21	M.J. Venditto	Review defendants' case management proposal for adversary proceeding	0.20	1,160.00	232.00
02/21/21	M.J. Venditto	Email correspondence with Richard Leveridge regarding defendants' case management proposal for adversary proceeding	0.20	1,160.00	232.00
02/21/21	M.J. Venditto	Participate in telephone conference call of counsel representing Plaintiffs in the adversary proceeding to discuss response to defendants' case management proposal	0.70	1,160.00	812.00
02/22/21	A. Kramer	Conference call with Ricarte, Hoff, Breene and Crawford re document search/review for	0.60	1,190.00	714.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Insurance Adversary, personal jurisdiction			
02/22/21	A. Kramer	email exchange with C. Ricarte re Marsh Service agreement	0.10	1,190.00	119.00
02/22/21	A. Kramer	Revise custodian list for document search/review for Insurance Adversary, personal jurisdiction	0.20	1,190.00	238.00
02/22/21	A. Kramer	Review Marsh Service agreement	0.20	1,190.00	238.00
02/22/21	A. Kramer	Review Marsh 6th Document production	3.80	1,190.00	4,522.00
02/22/21	A. Kramer	Respond to Z. Levine question re Additional Insured issues for Plan	0.30	1,190.00	357.00
02/23/21	A. Kramer	email exchange with R. Leveridge and Breene re telephone conversation and email with K. Wilson re service etc	0.40	1,190.00	476.00
02/23/21	A. Kramer	Telephone conversation and email with K. Wilson re service etc	0.50	1,190.00	595.00
02/24/21	A. Kramer	Conference call with Shore, Preis and Robertson re [REDACTED] waiver	0.30	1,190.00	357.00
02/24/21	A. Kramer	Communications with R. Leveridge re evidentiary support for personal jurisdiction	0.20	1,190.00	238.00
02/24/21	A. Kramer	Communications with Ricarte, Levine, Aleali re AHC revisions to insurance provisions in Plan draft	0.20	1,190.00	238.00



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Date	Timekeeper	Description	Hours	Rate	Amount
02/24/21	A. Kramer	email exchange with A. Pries and R. Shore re [REDACTED] waiver request	0.30	1,190.00	357.00
02/26/21	M.J. Venditto	Review and comment on draft correspondence to Judge Drain regarding agreed scheduling order	0.20	1,160.00	232.00
Totals			37.90		41,245.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	20.90 hrs @ \$	1,190.00 / hr	24,871.00
Michael J. Venditto	6.20 hrs @ \$	1,160.00 / hr	7,192.00
Paul E. Breene	7.00 hrs @ \$	1,160.00 / hr	8,120.00
Elizabeth F. Vieyra	0.20 hrs @ \$	540.00 / hr	108.00
Lianna E. Simmonds	3.60 hrs @ \$	265.00 / hr	954.00
Total Professional Services			41,245.00

INVOICE SUMMARY

Fees	\$ 41,245.00
10% Fee Discount	\$ (4,124.50)
Total Fees	\$ 37,120.50
TOTAL CURRENT INVOICE DUE	\$ 37,120.50
Total Amount Due	\$ 37,120.50



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Invoice Number: **3380303**
Invoice Date: **3/31/2021**
Client Number: **395187**
Matter Number: **395187.60005**

Client File No.: 20210003077

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH February 28, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
02/01/21	L.A. Szymanski	Prepare for service of adversary complaint by: review and revising UK affidavits of service prepared by paralegal L. Simmonds (1.2); participate in conference call w/ RS team (P. Breene, A. Kramer, A. Crawford, L. Simmonds, L. Vieyra) re: service (.4); send filed complaint to C. Nitsche for German translation (.1); communications w/ potential Bermuda firms re: service (.4); communications w/ C. Lewis (London) re: filed Complaint & additional Bermuda contacts for service (.2); communications w/ L. Simmonds re: pro hac vice application (.1)tion	2.40	800.00	1,920.00
02/01/21	L. E. Simmonds	Revise cover note to send to all Defendant contact emails in our possession.	0.20	265.00	53.00
02/01/21	P.E. Breene	Calls with RS team; E-mails with Preis, Hudson; Kramer; Crawford; Shore; and Venditto; Draft courtesy copy letters.	2.70	1,160.00	3,132.00
02/01/21	C. Lewis	Email to Walkers regarding	0.10	555.00	55.50



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Date	Timekeeper	Description	Hours	Rate	Amount
		service in Bermuda			
02/01/21	C. Lewis	Considering email from Lisa Szymanski and filed pleading and emails and call with CCasha regarding service	0.60	555.00	333.00
02/01/21	L. E. Simmonds	Revise IUA Hauge Convention Affidavits of Service with new address.	0.20	265.00	53.00
02/01/21	L. E. Simmonds	Begin Pro Hac Vice process for Lisa Szymanski.	1.40	265.00	371.00
02/01/21	L. E. Simmonds	Prepare and discuss serving Complaint and Summonses on all domestic insurers with contacted process servers. Update Hauge Convention Affidavits.	0.60	265.00	159.00
02/01/21	S. B. Rhea	Review court docket to determine if summons have been issued.	0.10	290.00	29.00
02/01/21	A. Kramer	Internal team conference call with Breene, Szymanski, Crawford and Vieyra re status of service, distribution of courtesy copies of Adversary Complaint	0.40	1,190.00	476.00
02/01/21	A. Kramer	email exchanges with Breene, Szymanski, Crawford, Vieyra and Simmonds re service, distribution of courtesy copies of Adversary Complaint, updating contact information	1.30	1,190.00	1,547.00
02/01/21	A. Kramer	Communications with Ricarte and PR team re press inquiries re Adversary filing	0.20	1,190.00	238.00
02/01/21	E. F. Vieyra	Planning for service of process on foreign insurers.	0.40	540.00	216.00



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Date	Timekeeper	Description	Hours	Rate	Amount
02/01/21	A. Crawford	Prepare for and participate in call regarding case.	1.10	650.00	715.00
02/01/21	C. Nitsche	Services in Europe: correspondence with L. Symanski; checked document and organized translation	0.40	565.00	226.00
02/01/21	L. E. Simmonds	Analyze all insurer contacts and create adversary complaint email list for Defendants.	1.90	265.00	503.50
02/02/21	L.A. Szymanski	Prepare for service of adversary complaint by: Communications w/ C. Nitzche re: German translation (.2); Communications w/ Bermuda counsel at Walkers re: conflicts check (.3); Communications w/ RS team re: same; Review pro hac vice application prepared by paralegal L. Simmonds (.2); communications w/ P. Breene, A. Kramer & M. Venditto re: drafting letter to judge re: procedural order to deal w/ motions to dismiss (.3).o deal w/ motiotns to dismiss.	1.00	800.00	800.00
02/02/21	P.E. Breene	Review materials re possible motions to dismiss; Review committee re draft of notice letter; Review Judge Drain rules; Call with group various strategy issues.	4.50	1,160.00	5,220.00
02/02/21	A. Kramer	Conference call with committees, Breene and Crawford re service, next steps etc	1.00	1,190.00	1,190.00



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Date	Timekeeper	Description	Hours	Rate	Amount
02/02/21	A. Kramer	Telephone conversation with K. Wilson re complaint, service etc	0.40	1,190.00	476.00
02/02/21	A. Kramer	Communications with Breene re communications with court re complaint, service etc	0.30	1,190.00	357.00
02/02/21	A. Kramer	Draft note briefing RS Team re telephone conversation with K. Wilson	0.10	1,190.00	119.00
02/02/21	A. Kramer	Communications with Simmonds, Szymanski et al re contacts for courtesy message to counsel re complaint,	0.30	1,190.00	357.00
02/02/21	S. B. Rhea	Review court docket to determine if summons have been issued.	0.10	290.00	29.00
02/02/21	M.J. Venditto	Review and respond to emails from Breene, Szymanski and Kramer regarding status of adversary proceeding	0.60	1,160.00	696.00
02/02/21	E. F. Vieyra	Correspondence regarding service of process on Bermuda insurers.	0.40	540.00	216.00
02/02/21	A. Crawford	Prepare for and participate in case strategy call.	1.00	650.00	650.00
02/02/21	M.J. Venditto	Review of adversary docket and complaint	1.00	1,160.00	1,160.00
02/02/21	L. E. Simmonds	Revise and update Defendant Insurer Contact List per Gilbert's provided information.	2.40	265.00	636.00
02/02/21	L. E. Simmonds	Draft Liz Vierya's Application for Admission to S.D.NY.	0.30	265.00	79.50
02/02/21	L. E. Simmonds	Make final Lisa Szymanski	0.60	265.00	159.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Motion for Pro Hac Vice and file the same.			
02/02/21	M.J. Venditto	Review draft of proposed case management request	0.60	1,160.00	696.00
02/03/21	L.A. Szymanski	Plan for service of adversary complaint: phone call w/ L. Simmonds re: same (.2); phone call w/ S. Rhea re: same (.2); phone call w/ M. Venditto, Breene and Kramer re: same (.4); email communications w/ RS team re: same (.2); email communications w/ Prime Clerk (.2); communications w/ Bermuda counsel re: service (.6); respond to questions from other counsel re: service (2.).	3.60	800.00	2,880.00
02/03/21	P.E. Breene	Call with RS team re service and preparation of letter to court (.50); Review Bankruptcy rules (.8); Review notice issues (.7); Review jurisdictional issues (2.5).	4.50	1,160.00	5,220.00
02/03/21	L. E. Simmonds	Research Prime Clerk to use for service and transmit information to Counsel.	0.50	265.00	132.50
02/03/21	L. E. Simmonds	Research and obtain letters sent to Judge Robert Drain by law firm Davis Polk.	1.00	265.00	265.00
02/03/21	A. Kramer	Communications with Ricarte re summons issuance	0.10	1,190.00	119.00
02/03/21	L. E. Simmonds	Finalize all courtesy letters to Defendants, draft all email correspondence, and transmit the same.	3.10	265.00	821.50



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Date	Timekeeper	Description	Hours	Rate	Amount
02/03/21	A. Kramer	Address AP service issues with Breene, Szymanski and Venditto	0.70	1,190.00	833.00
02/03/21	L. E. Simmonds	Draft and revise cover letters to all Counsel and Claims personnel for all Defendants.	2.00	265.00	530.00
02/03/21	M.J. Venditto	Participate in telephone conference call with Breene, Kramer and Szymanski to discuss status of service and proposed case management conference	0.40	1,160.00	464.00
02/03/21	A. Crawford	Correspond regarding coordination of service of Adversary Complaint.	1.60	650.00	1,040.00
02/03/21	A. Kramer	Conference call with Breene, Venditto and Szymanski re communications with chambers re Adversary Proceeding scheduling	0.50	1,190.00	595.00
02/03/21	L.A. Szymanski	Participate in conference call w/ P. Breene, M. Venditto & A. Kramer re: letter to judge drain; prepare draft of same; revisions to same.	1.50	800.00	1,200.00
02/03/21	A. Kramer	Review/revise draft letter to J. Drain re initial motion schedule	0.40	1,190.00	476.00
02/03/21	M.J. Venditto	Review status of service on domestic defendants	0.60	1,160.00	696.00
02/03/21	L. E. Simmonds	Communicate re service options, time frames of the same, and efficiency. Receive updated cover notes to Counsel and Claims adjuster and begin making changes to letters.	0.70	265.00	185.50



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Date	Timekeeper	Description	Hours	Rate	Amount
02/03/21	L. E. Simmonds	Research Judge Robert Drain's Chamber Rules regarding copies of pleadings. Draft, finalize, and transmit letter to Judge Drain enclosing Application for Pro Hac Vice.	0.80	265.00	212.00
02/03/21	L. E. Simmonds	Draft letter to Honorable Judge Robert Drain.	0.40	265.00	106.00
02/03/21	L. E. Simmonds	Revise Email Contact Master Chart. Draft and make final Cover Notes to Counsel and Claims Persons for transmitting courtesy copy of Adversary Complaint.	1.00	265.00	265.00
02/03/21	E. F. Vieyra	Revise Hague service forms based on summons.	0.60	540.00	324.00
02/04/21	L.A. Szymanski	Prepare for service of adversary complaint by the following: communications w/ Prime Clerk re: service on domestic carriers (.2); communications w/ paralegal L. Simmonds re: preparing spreadsheets of insurers addresses for same (.3); communications w/ C. Nitsche re: filed summons for sending for translation for purposes of Hague Service in Germany and Luxembourg (.2); finalize Hague Convention forms for service in Germany and Luxembourg (2.2); phone call w/ RS team re: domestic service (.4); email communications w/ RS team re: domestic service (.3) finalize Hague Convention forms for service in Germany	3.60	800.00	2,880.00



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		and Luxembourg; phone call w/ RS team re: domestic service; email communications w/ RS team re: domestic service;			
02/04/21	P.E. Breene	Call with RS team re service (.3); Revise letter to court (.30); Review legal memos re core proceedings (3.4).	4.00	1,160.00	4,640.00
02/04/21	A. Kramer	Telephone call and email exchange with R. Shore re service and letter to J. Drain re initial hearing on Adv Proceeding	0.40	1,190.00	476.00
02/04/21	A. Kramer	Communications with Breene, Venditto and Szymanski re service and letter to J. Drain re initial hearing on Adv Proceeding	0.70	1,190.00	833.00
02/04/21	A. Kramer	Conference call with committees re letter to J. Drain re initial hearing on Adv Proceeding	0.30	1,190.00	357.00
02/04/21	L. E. Simmonds	Revise and finalize all letters to Counsel and Claims attaching Adversary Complaint and Summons with edits from Mitchell P. Hurley at Akin.	1.30	265.00	344.50
02/04/21	L. E. Simmonds	Revise cover letters to all Counsel and Claims personnel for all Defendants after additional Gilbert edits.	1.20	265.00	318.00
02/04/21	A. Crawford	Research and draft analysis of NY insurance law regarding service of foreign and alien insurance companies.	4.60	650.00	2,990.00



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02/04/21	L. E. Simmonds	Conference call with Prime Clerk re service of domestic insurers.	0.40	265.00	106.00
02/04/21	E. F. Vieyra	Revise attorney information in Hague service forms.	0.10	540.00	54.00
02/04/21	M.J. Venditto	Review correspondence with counsel for the Creditors Committee and the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants regarding proposed case management conference	0.40	1,160.00	464.00
02/04/21	M.J. Venditto	Participate in telephone conference call with P. Breene, A. Kramer and M. Hurley to discuss application to Judge Drain	0.40	1,160.00	464.00
02/04/21	M.J. Venditto	Review various proposals and comments regarding request to Judge Drain for a case management conference	0.50	1,160.00	580.00
02/04/21	M.J. Venditto	Review and analysis of service requirements for domestic and foreign defendants	0.70	1,160.00	812.00
02/05/21	L.A. Szymanski	Prepare for service through the following: revise affidavits for UK service and Hague forms prepared by L. Vieyra & communications w/ C. Lewis re: same (.60); revise Hague forms for service in Germany & Luxembourg prepared by L. Vieyra (.50); communications w/ C. Nitsche re: same (.2); communications w/ Prime Clerk re: domestic service &	2.60	800.00	2,080.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		preparation of an affidavit of service (.4); draft comprehensive email re: service status to RS team (.9).communications w/ Prime Clerk re: domestic service & preparation of an affidavit of service; draft comprehensive email re: service status to RS team.			
02/05/21	P.E. Breene	Revise letter to court (.4); Review legal memos re core proceedings (2.3); communications with RS Team re service (.3)	3.00	1,160.00	3,480.00
02/05/21	L. E. Simmonds	Transmit all email contacts for external counsel and all defendants for invites to conference calls to be sent.	0.60	265.00	159.00
02/05/21	L. E. Simmonds	Transmit all courtesy letters to Counsel and claims. Update Email Contact Master Chart with newly provided contacts.	1.50	265.00	397.50
02/05/21	L. E. Simmonds	Communicate re filing Affidavit of Service before Wednesday, 2/10 deadline for domestic insurers.	0.40	265.00	106.00
02/05/21	L. E. Simmonds	Draft letter to Judge Drain.	1.00	265.00	265.00
02/05/21	L. E. Simmonds	Calendar all dates for court filings to be due and scheduling conference.	0.70	265.00	185.50
02/05/21	A. Kramer	E-mail exchange with Breene, Venditto, Szymanski re letters to insurers and J. Drain, correcting contact list	1.30	1,190.00	1,547.00
02/05/21	M.J. Venditto	Revise draft of letter to judge Drain requesting case	0.50	1,160.00	580.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		management conference			
02/08/21	L.A. Szymanski	Prepare for service by: communications w/ C. Lewis (London) re: service on UK entities (.1); communications w/ A. Doughty (Bermuda) re: service on Bermuda insurers(.1); communications w/ A. Kramer & client re: retention of Bermuda counsel (.2); communications w/ H. Baer (Prime Clerk) re: Affidavit of Service on domestic insurers (.1).	0.50	800.00	400.00
02/08/21	P.E. Breene	Call with RS team re service; Revise letter to court; DRaft e-mail to Committees re reasoning for changes to letter; Call with [REDACTED] re conflict issue; Review internal e-mails re conflict issue; Call with R. Shore re revisions to DRain letter and other matters.	4.50	1,160.00	5,220.00
02/08/21	L. E. Simmonds	Analyze all insurer contact information and provide Steadfast and Gulf information for letter to Judge.	0.50	265.00	132.50
02/08/21	A. Kramer	Draft/revise message to committees re [REDACTED] request	1.10	1,190.00	1,309.00
02/08/21	A. Kramer	email exchanges with committees, Breene and Venditto re initial letter to J. Drain re Adversary filing	0.40	1,190.00	476.00
02/08/21	A. Kramer	Address retention of Bermuda counsel for service on XL and ACE with G. Issa, C.	0.20	1,190.00	238.00



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		MacDonald and L. Szymanski			
02/08/21	A. Crawford	Revise correspondence to court.	0.70	650.00	455.00
02/08/21	M.J. Venditto	Telephone conversations with Breene and Kramer to discuss correspondence to Judge Drain regarding case management	0.30	1,160.00	348.00
02/08/21	L.A. Szymanski	Attention to Letter to Judge Drain and communications w/ P. Breene re: same; communications w/ L. Vieyra re: same on service.	0.40	800.00	320.00
02/08/21	T. Firth-Jones	Analysing service arrangements and emails re the same.	0.50	520.00	260.00
02/08/21	A. Kramer	Draft/revise initial letter to J. Drain re Adversary filing	0.40	1,190.00	476.00
02/08/21	M.J. Venditto	Review proposed revisions to draft letter to judge Drain regarding case management	0.40	1,160.00	464.00
02/08/21	M.J. Venditto	Prepare draft response to to Shore and Hurley regarding adversary proceeding case management	0.50	1,160.00	580.00
02/09/21	L.A. Szymanski	Prepare for service of adversary complaint through the following: Participate in conference w/ A. Doughy (Bermuda counsel) re: retention (.5); Review and revise Hague Convention forms prepared by C. Nitsche for service on insurers in Germany & Luxembourg (.4); communications w/ A. Kramer & client re: retention of	1.60	800.00	1,280.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Bermuda counsel (.2); review and revise final documents for UK service & communications w/ C. Lewis (London) & T. Firth Jones re: same (.4); communications w/ L. Vieyra re: Hague service questions (.1.) & T. Firth Jones re: same; communications w/ L. Vieyra re: Hague service questions.			
02/09/21	P.E. Breene	Call with RS team re case management (.3); Finalize letter to court (.40); Draft e-mail to Court (.30); Draft E-mail to defendants (.3); Call with Committees re prep for 2/10 call (.70); E-mails to DPW; Kramer; Venditto (.3); draft proposed agenda to defendants (.90).	3.20	1,160.00	3,712.00
02/09/21	A. Kramer	Conference call and email exchange with Hudson and Shore re prep for call with B Friedman	0.40	1,190.00	476.00
02/09/21	A. Kramer	Revise message to insurers re organizing call	0.40	1,190.00	476.00
02/09/21	A. Kramer	Pre-call with the Committees, Breene and Venditto for call with insurers	0.70	1,190.00	833.00
02/09/21	A. Kramer	Zoom call with B. Friedman (Travelers/Gulf/St. Paul) and committees re Adversary Complaint	0.30	1,190.00	357.00
02/09/21	C. Lewis	Emails and call with TFirth-Jones regarding service on insurers and email to LSzymanski regarding	1.10	555.00	610.50



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Date	Timekeeper	Description	Hours	Rate	Amount
		service.			
02/09/21	A. Kramer	Address retention of Bermuda counsel for service on XL and ACE with G. Issa, C. MacDonald and L. Szymanski	0.20	1,190.00	238.00
02/09/21	C. Nitsche	Service Germany/Luxembourg: checked/amended applications; liaised with authorities re party requirements; email with summary	1.00	565.00	565.00
02/09/21	M.J. Venditto	Review and comment on proposed revisions to correspondence with Judge Drain	0.30	1,160.00	348.00
02/09/21	M.J. Venditto	Review correspondence and comments from Richard Shore at Gilbert relating to proposed communication with Judge Drain	0.20	1,160.00	232.00
02/09/21	M.J. Venditto	Review of documents regarding the service of process on domestic defendants	0.30	1,160.00	348.00
02/09/21	A. Kramer	email exchange with Venditto and Breene re arbitration issues	0.20	1,190.00	238.00
02/09/21	A. Kramer	email exchange with Venditto and Breene re B. Friedman meeting, [REDACTED]	0.20	1,190.00	238.00
02/09/21	M.J. Venditto	Confer with Lisa Szymanski regarding service on European domiciled defendants	0.20	1,160.00	232.00
02/09/21	M.J. Venditto	Confer with Paul Breene regarding proposal to	0.20	1,160.00	232.00



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		adversary proceeding defendants for a conference call to discuss case management			
02/09/21	L. E. Simmonds	Analyze all entities provided to Bermuda counsel to ensure all conflict checks taken place.	0.50	265.00	132.50
02/09/21	L. E. Simmonds	File letter to Judge Drain requesting telephonic conference and transmit the same to Counsel.	0.50	265.00	132.50
02/09/21	T. Firth-Jones	Amending draft postal service and personal service affidavits.	0.80	520.00	416.00
02/09/21	T. Firth-Jones	Reviewing suite of documents and email from C Lewis, prior to call. Preparing for and attending call with C Lewis. Arranging for external printing of relevant suite of documents. Introduction email to L Szymanski with queries.	2.50	520.00	1,300.00
02/09/21	M.J. Venditto	Review and comment on draft correspondence to adversary proceeding defendants proposing a conference to discuss case management	0.70	1,160.00	812.00
02/09/21	M.J. Venditto	Review of email from Judge Drain and draft response	0.30	1,160.00	348.00
02/09/21	M.J. Venditto	Participate in telephone conference call among counsel for adversary proceeding plaintiffs to discuss case management issues	0.70	1,160.00	812.00
02/10/21	L.A. Szymanski	Prepare for service of	1.50	800.00	1,200.00



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		adversary complaint through the following: conference w/ C. Nitsche re: service in Germany & Luxembourg; communications w/ S. Rhea re: same. Draft engagement letter to A. Doughy & communications w/ A. Kramer re: same. Communications w/ T. Firth Jones re: service in UK.			
02/10/21	P.E. Breene	Review materials re enforcement of arbitration clauses in policies (1.8); Revise agenda for call with insurance companies (.3); E-mail exchanges with Gilbert re issues for call with insurance companies (.4); Participate in call with insurance companies (.60); Various e-mail exchanges with RS team re next steps (.5).	3.60	1,160.00	4,176.00
02/10/21	A. Kramer	Telephone conversation with C. Ricarte re scheduling negotiations with insurers, plan timing etc	0.30	1,190.00	357.00
02/10/21	A. Kramer	communications with Ricarte, Breene and committees re [REDACTED] waiver request.	0.30	1,190.00	357.00
02/10/21	A. Kramer	Conference call with insurers and committees re procedural agreements	0.60	1,190.00	714.00
02/10/21	A. Kramer	Conference call with Breene and committees re insurer call	0.50	1,190.00	595.00
02/10/21	C. Lewis	Reviewing amended draft affidavits, considering	0.70	555.00	388.50



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Date	Timekeeper	Description	Hours	Rate	Amount
		question on Model Form and emails with TFirth-Jones and LSzymanski regarding service.			
02/10/21	A. Kramer	work with Crawford and Breene on insurer contact list	0.30	1,190.00	357.00
02/10/21	A. Kramer	email exchange with Simmonds, Szymanski, Venditto and Breene re service issue with Z. North America	0.20	1,190.00	238.00
02/10/21	L. E. Simmonds	Receive voice mail from Fred Tucci at Zurich and reach out to communicate re Adversary Complaint.	1.00	265.00	265.00
02/10/21	L. E. Simmonds	Communicate with Lisa Szymanski re Fred Tucci voice mail, filings, and service.	1.00	265.00	265.00
02/10/21	L.A. Szymanski	Phone call w/ L. Simmonds re: contact from Zurich re: adversary complaint.	0.20	800.00	160.00
02/10/21	L.A. Szymanski	Participate in conference call w/ insurer counsel & RS team.	1.00	800.00	800.00
02/10/21	A. Crawford	Prepare for and participate in coordination call with all parties.	2.50	650.00	1,625.00
02/10/21	T. Firth-Jones	Further discussion and analysis of service documents and emails. Compiling four sets of documents, emails to C Lewis re the same and call finalising arrangements. Proofing documents.	3.50	520.00	1,820.00
02/10/21	T. Firth-Jones	Finalising documents for personal and postal service	2.60	520.00	1,352.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		and amends. Providing to L Szymanski for reference. Analysing position and emails re the same.			
02/10/21	A. Kramer	Revise Szymanski call notes	0.10	1,190.00	119.00
02/11/21	P.E. Breene	Review materials re personal jurisdiction over foreign insurance companies (.60); Review information re service on UK and Bermuda companies (.20); Review [REDACTED] conflict issues and correspondence re same (.20); Correspondence with client re developments in case (.8); Review and comment on contacts sheet prepared by Crawford (.2).	2.00	1,160.00	2,320.00
02/11/21	A. Kramer	email exchanges with S. Roitman re [REDACTED] for personal jurisdiction motion	0.20	1,190.00	238.00
02/11/21	L. E. Simmonds	Draft Notice of Appearance for Anthony Crawford and Ann Kramer and file the same on the docket.	1.00	265.00	265.00
02/11/21	A. Kramer	Research re [REDACTED] personal jurisdiction motion	0.70	1,190.00	833.00
02/11/21	A. Kramer	communications with Breene re [REDACTED] for personal jurisdiction motion	0.20	1,190.00	238.00
02/11/21	L. E. Simmonds	Finalize Ann Kramer Notice of Appearance and communicate with PACER re	0.80	265.00	212.00



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		issues for her account to e-file.			
02/11/21	L. E. Simmonds	Receive return call from Fred Tucci and receive information on whom complaint was transferred to. Update memo re the same.	1.00	265.00	265.00
02/11/21	L.A. Szymanski	Prepare for service of adversary complaint by doing the following: review engagement sent by Bermuda counsel (.2); communications w/ Bermuda counsel, A. Kramer & M. Venditto re: engagement (.1); communications w/ A. Kramer & client re: Bermuda engagement (.2); review comprehensive email from T. Firth Jones re: service in the UK (.2).	0.70	800.00	560.00
02/11/21	A. Crawford	Draft analysis and summary of coordination call for client and file appearance in case.	3.30	650.00	2,145.00
02/11/21	A. Kramer	Address retention of Bermuda counsel for service with Aleali, Szymanski, Venditto	0.50	1,190.00	595.00
02/11/21	A. Kramer	Review/revise summary of insurer call for client	0.10	1,190.00	119.00
02/11/21	T. Firth-Jones	Personal and postal service of documents on Tenecom Limited and IAU.	3.40	520.00	1,768.00
02/11/21	T. Firth-Jones	Writing up note of service to be used to update affidavits and drafting update to C Lewis and L Szymanski. Updating the drafting of substantive sections of	1.50	520.00	780.00



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		affidavits of service with details of service.			
02/11/21	T. Firth-Jones	Updating affidavits. Email to C Lewis attaching updated documents.	1.90	520.00	988.00
02/12/21	L.A. Szymanski	Prepare for service of adversary complaint by the following: Communications w/ C. Lewis & T. Firth Jones re: Affidavit of UK Service; communications w/ RS team re: same. Communications w/ A. Doughy re: Bermuda engagement; communications w/ A. Kramer & RS team re: same.	1.20	800.00	960.00
02/12/21	C. Lewis	Reviewing case and advice on affidavit and considering options for witnessing affidavit and emails with TFirth-Jones and LSzymanski regarding the same.	0.70	555.00	388.50
02/12/21	L. E. Simmonds	Research and draft request for Certificate of Good Standing needed to obtain e-filing access in the SDNY Bankruptcy Court for Ann Kramer.	1.00	265.00	265.00
02/12/21	A. Crawford	Communicate internally regarding service under Hague Convention.	0.30	650.00	195.00
02/12/21	T. Firth-Jones	Emails with L Szymanski, C Lewis and others re affidavit witnessing. Analysis English law position on witnessing/authenticating affidavits and recent impact of decision on remote	2.60	520.00	1,352.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		authorisation. Arranging signing / witnessing with K Felmingham of Fox Williams LLP. Updates to affidavits.			
02/13/21	C. Lewis	Emails with TFirth-Jones regarding affidavits of service	0.30	555.00	166.50
02/13/21	T. Firth-Jones	Finalising IUA postal service affidavit following delivery notification on 13.02.2021. Email to C Lewis on final arrangements for authorising/signing and arranging with K Felmingham.	0.80	520.00	416.00
02/14/21	C. Lewis	Reviewing White Book and rules regarding personal service, emails and calls with TFirth-Jones re the same and emails with LSzymanski	0.60	555.00	333.00
02/14/21	L.A. Szymanski	Communications w/ C. Lewis & T. Firth Jones (London) re: service on UK insurer defendants.	0.20	800.00	160.00
02/14/21	T. Firth-Jones	Finalising affidavits for signing/witnessing. Signing documents and getting witnessed/authorised by K Felmingham. Call with C Lewis and then providing signed postal service affidavits to case team.	3.20	520.00	1,664.00
02/15/21	L.A. Szymanski	Attention to service of adversary complaint through the following: communications w/ Bermuda counsel re: wire instructions for retainer payment (.6); draft update to RS team re: service on UK carriers & status of service on	1.90	800.00	1,520.00



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		Bermuda carriers (.5); communications w/ paralegal N. Sooy re: examples of form of Bermuda Affidavit of Service to provide to Bermuda counsel (.2); communications w/ S. Rhea re: filing Affidavits of Postal Service on UK carriers (.2).unications w/ paralegal N. Sooy re: examples of form of Bermuda Affidavit of Service to provide to Bermuda counsel; communications w/ S. Rhea re: filing Affidavits of Postal Service on UK carriers.			
02/15/21	P.E. Breene	Respond to various e-mails and review status of service of process.	1.00	1,160.00	1,160.00
02/15/21	N. Sooy	Research re proper form of Affidavit for service of complaint and summons in Bermuda	1.00	380.00	380.00
02/15/21	E. F. Vieyra	Complete and sign application for admission to SDNY.	0.20	540.00	108.00
02/15/21	M.J. Venditto	Review documents regarding status of service of summons and complaint in adversary proceeding Avrio Health v. AIG Specialty Insurance	0.40	1,160.00	464.00
02/16/21	L.A. Szymanski	Prepare for service of adversary complaint through the following actions: Communications w/ opposing counsel re: service on Bermuda insurers (.3); communications w/ P. Breene re: same (.2).	4.40	800.00	3,520.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Communications w/ A. Kramer re: request from opposing counsel K. Wilson re: service on clients (.2). Phone call w/ A. Doughty (Bermuda counsel) re: service on Bermuda insurers (.3). Communications w/ L. Vieyra re: extension of Hague Convention to Bermuda carriers (.2). Populate Hague Convention Forms for all Bermuda insurers for use by local counsel in serving adversary complaint (1.8). Email communications w/ counsel for HDI re: service in the UK (.2); communications w/ P. Breene re: same (.1); communications w/ L. Vieyra re: HDI policies (.2); communications w/ A. Crawford re: same (.1); communications w/ C. Lewis re: service on HDI in UK (.1); attention to points raised by counsel for HDI (.7).			
02/16/21	P.E. Breene	Calls and e-mail exchanges re service or process in UK; Germany; Bermuda and Luxembourg (1.2); Respond to insurance company counsel e-mails (.4); Internal call with team re next steps (.4).	2.00	1,160.00	2,320.00
02/16/21	A. Kramer	E-mail exchanges with K. Wilson, L. Szymanski, Breene and Liederman re service issues on foreign insurers	0.70	1,190.00	833.00
02/16/21	A. Kramer	Telephone conversation with	0.20	1,190.00	238.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		R. Leveridge re personal jurisdiction issues, communications with insurers related to MDL			
02/16/21	A. Kramer	Conference call with Breene, Crawford, Szymanski and Venditto re service and preparation for initial briefing	0.40	1,190.00	476.00
02/16/21	A. Kramer	E-mail exchanges with A. Crawford and N. Sooy re production of RS emails	0.20	1,190.00	238.00
02/16/21	A. Kramer	Conference call with Breene, Venditto, Szymanski and Crawford re planning for motions, service etc	0.50	1,190.00	595.00
02/16/21	M.J. Venditto	Participate in telephone conference call with Kramer, Breene, Crawford and Szymanski to discuss status of service on foreign defendants and case management discussions with defendants	0.40	1,160.00	464.00
02/16/21	A. Crawford	Prepare for and participate in calls regarding case status and foreign service.	3.50	650.00	2,275.00
02/16/21	L.A. Szymanski	Communications w/ RS team re: allocation of briefings in response to anticipated motions from insurers.	0.50	800.00	400.00
02/16/21	E. F. Vieyra	Research about Bermuda adoption of Hague convention.	0.40	540.00	216.00
02/16/21	A. Kramer	Review communications with insurers related to MDL insurance requests	1.40	1,190.00	1,666.00
02/16/21	E. F. Vieyra	Research domicile of insurer	1.10	540.00	594.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		HDI.			
02/17/21	L.A. Szymanski	Attention to service of adversary complaint through the following: Review findings of UK & US libraries on HDI in UK (.3); Communications w/ P. Breene re: UK service on HDI (.2); communications w/ L. Vieyra re: HDI policies (.2); communications w/ C. Lewis (London) re: service on HDI in London (.2); Call w/ A. Kramer & A. Crawford re: suit on Gerling policies and service on HDI (.3); prepare all papers needed for C. Johnson to serve HDI in London (2.7); communications w/ counsel for HDI re: service in London; Communications w/ Bermuda counsel re: service on Bermuda insurers (.3); review email from C. Nitsche re: service on Luxembourg & German insurers (.1).	4.30	800.00	3,440.00
02/17/21	P.E. Breene	Further work on service of process issues.	1.00	1,160.00	1,160.00
02/17/21	C. Lewis	Emails with LSzymanski regarding service on German company, considering case on service.	1.00	555.00	555.00
02/17/21	E.D. Mantzopoulos	Create a new Relativity database and provide access to the case team. Stage documents provided by Nora Sooy to our network for our operations team to process them into our database. Provide the operations team	2.00	475.00	950.00



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		with processing instructions and monitor their progress.			
02/17/21	A. Kramer	Conference call with Szymanski and Crawford re service issues with HDI Gerling	0.30	1,190.00	357.00
02/17/21	A. Kramer	email exchanges with A. Crawford, Sooy and Mantzopoulos re documents for Gilbert re personal jurisdiction	0.30	1,190.00	357.00
02/17/21	A. Kramer	email exchanges with Szymanski and Breene re service issues.	0.20	1,190.00	238.00
02/17/21	A. Crawford	Prepare for and participate in case strategy call.	2.10	650.00	1,365.00
02/17/21	M.J. Venditto	Review and respond to email received from Lisa Szymanski regarding Luxembourg service	0.20	1,160.00	232.00
02/17/21	S. DeMaris	SZMANSKI-Docket research: [REDACTED]	0.30	355.00	106.50
02/17/21	S. B. Rhea	Finalize and submit Notice of Appearance for A. Kramer in accordance with local rules.	0.30	290.00	87.00
02/17/21	E. F. Vieyra	Research about HDI / Gerling policies.	0.60	540.00	324.00
02/17/21	N. Sooy	Analyze correspondence documents from attorney A. Kramer for production	0.20	380.00	76.00
02/18/21	L.A. Szymanski	Attention to service of adversary complaint through the following: Communications w/ London	1.10	800.00	880.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Library re: HDI & review findings on same (.2). Communications w/ C. Johnson re: service on HDI in London & review cover letter to be served w/ same (.2); Communications w/ opposing counsel re: service on Bermuda insurers (.3) Communications w/ Bermuda counsel re: affidavit of service (.4)			
02/18/21	P.E. Breene	Further work on service of process issues; E-mail exchanges with Gilbert team; Prep call with Gilbert and Akin teams; Review core v. non-core briefing.	2.50	1,160.00	2,900.00
02/18/21	A. Kramer	Conference call with Committee counsel re motion schedule, planning for call with insurers	0.40	1,190.00	476.00
02/18/21	L.A. Szymanski	Participate in conference call w/ RS team & other plaintiffs' counsel in order to get on same page in advance of call w/ insurers.	0.50	800.00	400.00
02/18/21	A. Kramer	Telecon with P. Breene re conference call with Committee counsel re motion schedule, planning for call with insurers	0.10	1,190.00	119.00
02/18/21	A. Crawford	Draft communication regarding foreign service.	0.70	650.00	455.00
02/18/21	C. Nitsche	Service Germany/Luxembourg: Summary for L. Szymanski re status and specifics of service	0.40	565.00	226.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		under civil law			
02/18/21	C. Lewis	Considering documents for service on HDI, drafting covering letter for service, reivewing research from trainee about effecting service on London office of foreign company.	0.60	555.00	333.00
02/18/21	M.J. Venditto	Participate in telephone conference call of the Plaintiffs' counsel in adversary proceeding to discuss case management and preparation for call with meet and confer with Defendants	0.40	1,160.00	464.00
02/18/21	M.J. Venditto	Review report on service of summons and complaint on foreign defendants	0.30	1,160.00	348.00
02/19/21	L.A. Szymanski	Attention to service of adversary complaint through the following: Communications w/ Bermuda counsel re: affidavit of service (.2); prepare shell for same(.1); communications w/ S. Rhea re: filing of same (.2) Communications w/ C. Lewis re: service of HDI in London (.2); communications w/ RS team re: same (.2) Communications w/ German team re: status of service in Germany & Luxembourg; communications w/ RS team re: same(.2)	1.10	800.00	880.00
02/19/21	A. Kramer	email exchange with C. Ricarte re conference calls with insurers and with	0.40	1,190.00	476.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		committees and proposed response			
02/19/21	A. Kramer	Conference call with committees re insurer coordination call	0.40	1,190.00	476.00
02/19/21	A. Kramer	Conference call with insurers re schedule to respond to complaint	0.50	1,190.00	595.00
02/19/21	P.E. Breene	Further work on service of process issues; E-mail exchanges with Gilbert team; Call with insurance companies; Draft e-mail letter/counter offer to insurance companies; Recap call with co-plaintiffs; Review discovery issues re "personal jurisdiction" over tower insurance companies.	3.50	1,160.00	4,060.00
02/19/21	L.A. Szymanski	Participate in conference call w/ insurers re: scheduling coordination on motions to dismiss; participate in follow up call re: same w/ RS & co-plaintiffs' counsel.	1.00	800.00	800.00
02/19/21	A. Kramer	Canada Status call [REDACTED]	0.40	1,190.00	476.00
02/19/21	A. Crawford	Prepare for and participate in calls with and regarding the insurers.	1.80	650.00	1,170.00
02/19/21	C. Nitsche	Service Germany/Luxembourg: checked with authorities/update to L. Szymanski	0.20	565.00	113.00
02/19/21	M.J. Venditto	Research case management precedents	0.50	1,160.00	580.00



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Date	Timekeeper	Description	Hours	Rate	Amount
02/19/21	A. Kramer	Review/revise draft response to insurers re scheduling response to complaint	0.70	1,190.00	833.00
02/19/21	S. B. Rhea	Finalize and submit Affidavit of Service for Arch Reinsurance, Ltd., XL Bermuda, Ltd., Chubb Bermuda Insurance, Ltd., Allied World Insurance Company, Ltd. and American International Reinsurance Company, Ltd.	0.30	290.00	87.00
02/19/21	C. Lewis	Arranging service on HDI by post and sending update to LSzymanski	0.70	555.00	388.50
02/19/21	M.J. Venditto	Review and comment on draft response to Defendants' proposal for case management	0.30	1,160.00	348.00
02/19/21	M.J. Venditto	Participate in telephone conference call of counsel representing Plaintiffs in the adversary proceeding to discuss defendants' case management proposal	0.30	1,160.00	348.00
02/19/21	M.J. Venditto	Participate in telephonic "meet and confer" of all counsel in adversary proceeding to discuss proposal for case management	0.40	1,160.00	464.00
02/20/21	A. Crawford	Finalize production of email communications between Reed SMith and various tower carriers.	1.30	650.00	845.00
02/21/21	A. Kramer	email exchanges with Ricarte, Breene and Leveridge re insurers response re motion	0.40	1,190.00	476.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		schedule			
02/21/21	A. Kramer	Conference call with Committees re responding to insurers re motion schedule	0.80	1,190.00	952.00
02/21/21	A. Crawford	Draft correspondence to UCC counsel.	0.80	650.00	520.00
02/21/21	A. Kramer	Review/revise draft response to insurers re motion schedule	0.60	1,190.00	714.00
02/22/21	P.E. Breene	E-mail exchanges with insurance companies; Call with client re discovery issues re "personal jurisdiction" over tower insurance companies; Review personal; injury documents.	2.30	1,160.00	2,668.00
02/22/21	E.D. Mantzopoulos	Process documents for production and stage to our sharefile site for sending to opposing counsel.	2.00	475.00	950.00
02/22/21	A. Crawford	Prepare for and participate in case strategy call.	1.90	650.00	1,235.00
02/23/21	A. Kramer	email exchange with Ricarte, Morrissey et al re scope of searches and AKO database	0.30	1,190.00	357.00
02/23/21	P.E. Breene	E-mail exchanges with insurance companies and Gilbert and UCC group (.3); Review [REDACTED] briefing; Call re discovery issues (2.7).	3.00	1,160.00	3,480.00
02/23/21	E. F. Vieyra	Revise application for admission to SDNY based on clerk instructions.	0.50	540.00	270.00
02/23/21	A. Crawford	Draft email regarding case status.	0.50	650.00	325.00



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Date	Timekeeper	Description	Hours	Rate	Amount
02/24/21	L.A. Szymanski	Plan for service by the following: Communications w/ counsel for HDI re: UK service; communications w/ C. Lewis (London re: same).	0.60	800.00	480.00
02/24/21	A. Kramer	email exchange with committees re K. Wilson Zurich messages	0.10	1,190.00	119.00
02/24/21	A. Kramer	email exchange with K. Wilson re Zurich policies, service, [REDACTED]	0.30	1,190.00	357.00
02/24/21	C. Lewis	Considering query on service by post under Hague Convention.	0.60	555.00	333.00
02/24/21	A. Kramer	email exchanges with Breene et al re response to insurers re motion schedule	0.30	1,190.00	357.00
02/24/21	P.E. Breene	E-mail exchanges with insurance companies and Gilbert and UCC group (.30); Call with Co-Plaintiffs re response to insurance companies' scheduling proposal (.40); Revise e-mail to insurance companies(.40); Calls with Leveridge re changes to letter (.40); E-mails with Kramer and client re issues with schedule (.20); Review e-mails re discovery issues (.30).	2.00	1,160.00	2,320.00
02/24/21	L.A. Szymanski	Participate in conference call w/ Plaintiff teams re: service & response to insurer counter-proposal.	0.40	800.00	320.00
02/24/21	A. Crawford	Draft correspondence regarding case status.	0.30	650.00	195.00



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Date	Timekeeper	Description	Hours	Rate	Amount
02/25/21	P.E. Breene	E-mail exchanges with insurance companies and Gilbert and UCC group; Work on internal electronic discovery issues.	1.50	1,160.00	1,740.00
02/26/21	A. Kramer	Work on scheduling order negotiation, finalization with committees and client	0.60	1,190.00	714.00
02/26/21	P.E. Breene	Draft proposed scheduling order and letter to Judge Drain (1.30); Gather comments re same within firm and from co-plaintiff counsel (.50); Make revisions (.60); draft note to insurance companies for comment and approval (.20); E-mail exchanges internal electronic discovery issues (.20).sues.	2.80	1,160.00	3,248.00
02/26/21	E. F. Vieyra	Review and analyze previous orders in adversarial proceeding.	0.20	540.00	108.00
02/26/21	A. Crawford	Draft scheduling order and participate in call regarding the same.	0.70	650.00	455.00
02/26/21	E. F. Vieyra	Draft proposed scheduling order.	0.80	540.00	432.00
Totals			235.90		189,792.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	27.40 hrs @ \$	1,190.00 / hr	32,606.00
Paul E. Breene	53.60 hrs @ \$	1,160.00 / hr	62,176.00
Michael J. Venditto	13.00 hrs @ \$	1,160.00 / hr	15,080.00



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Timekeeper	Hours	Rate	Total
Lisa A. Szymanski	37.80 hrs @ \$	800.00 / hr	30,240.00
Anthony Crawford	28.70 hrs @ \$	650.00 / hr	18,655.00
Christina Nitsche	2.00 hrs @ \$	565.00 / hr	1,130.00
Catherine Lewis	7.00 hrs @ \$	555.00 / hr	3,885.00
Elizabeth F. Vieyra	5.30 hrs @ \$	540.00 / hr	2,862.00
Thomas Firth-Jones	23.30 hrs @ \$	520.00 / hr	12,116.00
Elias D. Mantzopoulos	4.00 hrs @ \$	475.00 / hr	1,900.00
Nora Sooy	1.20 hrs @ \$	380.00 / hr	456.00
Scott DeMaris	0.30 hrs @ \$	355.00 / hr	106.50
Shikendra B. Rhea	0.80 hrs @ \$	290.00 / hr	232.00
Lianna E. Simmonds	31.50 hrs @ \$	265.00 / hr	8,347.50
Total Professional Services			189,792.00

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
	Data Hosting Fee	19.67
	User Fee	75.00
02/02/2021	SUPREME COURT OF PENNSYLVANIA - FILING FEES Certificate of Good Standing	25.00
02/02/2021	ADMINISTRATIVE OFFICE OF THE COURTS - GENERAL EXPENSE Monthly subscription fee; Jan 2021	40.00
02/03/2021	UNITED PARCEL SERVICE - 00843 UPS - Shipped from Rita A. Gilson Reed Smith LLP - Philadelph to Irene Bizzoso Supreme Court of PA (HARRISBURG PA 17120) Elizabeth Vieyra 1Z7332X60194143137	12.63
02/03/2021	UNITED PARCEL SERVICE - 00843 UPS - Shipped from Lianna E. Simmonds Reed Smith LLP - Philadelph to The Honorable Robert U.S. Bankruptcy Court for t (WHITE PLAINS NY 10601) Lisa Szymanski 1Z7332X60199958383	15.23



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Date	Description	Amount
02/04/2021	UNITED PARCEL SERVICE - 00843 UPS - Shipped from Elizabeth Vieyra Reed Smith LLP to Rita A. Gilson Reed Smith LLP - Philadelph (Philadelphia PA 19103) Elizabeth Vieyra 1Z7332X68490836544	13.68
02/04/2021	LISA SZYMANSKI - Filing Fees - VENDOR: Lisa Szymanski, Feb 04, 2021, Filing Fee for Motion for Pro Hac	200.00
02/10/2021	Santis Business Services Ltd - SANTIS SAMEDAY:SW1E 6NP	6.89
02/10/2021	London Legal and Imaging Solutions Ltd - London Legal Print Request	85.97
02/11/2021	Thomas Firth-Jones - Uber - VENDOR: Thomas Firth-Jones, Feb 11, 2021, Uber taken to serve documents by Tom Firth-Jones personally Receipt attached.	14.10
02/11/2021	Thomas Firth-Jones - Uber - VENDOR: Thomas Firth-Jones, Feb 11, 2021, 2nd Uber taken to serve documents by Tom Firth-Jones personally Receipt attached.	17.20
02/11/2021	Thomas Firth-Jones - Postage - VENDOR: Thomas Firth-Jones, Feb 11, 2021, Postage paid for document to be sent to client Receipt attached.	21.17
02/15/2021	MJM Limited - FOREIGN LAWYERS FEES Retainer fee for service of complaints.	2,500.00
02/16/2021	GO! Express & Logistics Frankfurt GmbH - Niedersächsisches Justizministerium Hannover	15.07
02/16/2021	GO! Express & Logistics Frankfurt GmbH - Le Procureur Luxembourg	54.97
02/18/2021	London Legal and Imaging Solutions Ltd - London Legal Print Request	82.67
02/18/2021	Lexint Gmbh - TRANSLATION FEE The disbursement description should read "German language translation"	3,614.35
02/18/2021	Lexint Gmbh - Lexint Gmbh - TRANSLATION FEE The disbursement description should read "German language translation"	2,945.82
02/18/2021	Lexint Gmbh - Lexint Gmbh - TRANSLATION FEE The disbursement description should read "German language translation"	(3,614.35)



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Purdue Pharma L.P.
One Stamford Forum
201 Tresser Boulevard
Stamford, CT 06901

Invoice Number: **3387791**
Invoice Date: **4/16/2021**
Client Number: **395187**
Matter Number: **395187.60001**

Client File No.: 20190002679

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH March 31, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
03/03/21	A. Kramer	Follow up call with Ricarte re conference call with Marsh re D&O coverage	0.30	1,190.00	357.00
03/03/21	A. Kramer	Conference call with client (Lowne, Aleali, Ricarte and Jack), Marsh and DPW re D&O coverage [REDACTED]	1.00	1,190.00	1,190.00
03/14/21	A. Kramer	Telephone calls and email exchanges with Ricarte, Breene, Aleali and DPW team re D&O insurance [REDACTED]	4.40	1,190.00	5,236.00
03/15/21	A. Kramer	Telephone calls and email exchanges with Ricarte, Breene, Aleali and DPW team re D&O insurance issues	3.80	1,190.00	4,522.00
03/16/21	A. Kramer	E-mail exchange with C. Ricarte re Imes request [REDACTED]	0.40	1,190.00	476.00
03/16/21	A. Kramer	research prior production of D&O policies	0.70	1,190.00	833.00
03/17/21	A. Kramer	Revise Ricarte message to L. Imes re [REDACTED]	0.20	1,190.00	238.00
03/26/21	A. Kramer	email exchange with Ricarte and Oluwole re Data Room	0.30	1,190.00	357.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		documents for L. Imes			
03/26/21	A. Kramer	Review Data Room index for documents responsive to L. Imes	0.30	1,190.00	357.00
03/31/21	A. Kramer	E-mail exchange with C. Ricarte and C. Oluwole re document requests from L. Imes re [REDACTED]	0.60	1,190.00	714.00
Totals			12.00		14,280.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	12.00 hrs @ \$	1,190.00 / hr	14,280.00
Total Professional Services			14,280.00

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
03/04/2021	ADMINISTRATIVE OFFICE OF THE COURTS - GENERAL EXPENSE Monthly subscription fee; Feb 2021	40.00
Total Expenses and Other Charges		40.00

INVOICE SUMMARY

Fees	\$ 14,280.00
Less 14% Fee Discount	\$ (1,999.20)
Total Fees	\$ 12,280.80
Total Expenses and Other Charges	\$ 40.00
TOTAL CURRENT INVOICE DUE	\$ 12,320.80



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Stamford, CT 06901

Invoice Number: **3387756**
Invoice Date: **4/16/2021**
Client Number: **395187**
Matter Number: **395187.60002**

Client File No.: 20190002678

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH March 31, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
03/05/21	A. Kramer	Canada status call with Ricarte, Stikeman and Robertson	0.40	1,190.00	476.00
03/12/21	A. Kramer	Canada Status call with C. Ricarte, Stikeman team and C. Robertson	0.60	1,190.00	714.00
Totals			1.00		1,190.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	1.00 hrs @ \$	1,190.00 / hr	1,190.00
Total Professional Services			1,190.00

INVOICE SUMMARY

Fees	\$	1,190.00
Less 14% Fee Discount	\$	(166.60)
Total Fees	\$	<u>1,023.40</u>

TOTAL CURRENT INVOICE DUE **\$ 1,023.40**

Total Amount Due **\$ 1,023.40**



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Invoice Number: **3389049**
Invoice Date: **4/21/2021**
Client Number: **395187**
Matter Number: **395187.60004**

Client File No.: 20190002676

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH March 31, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
03/01/21	L.A. Szymanski	Review redactions to Zurich settlement agreement made by paralegal N. Sooy for purposes of sharing w/ creditor committee.	0.60	800.00	480.00
03/01/21	A. Kramer	Draft response to DPW questions re plan definition of [REDACTED] Policies	0.60	1,190.00	714.00
03/01/21	A. Kramer	E-mail exchange with Aleali, Ricarte and Massman re AHC comments on Plan draft insurance terms	0.30	1,190.00	357.00
03/02/21	A. Kramer	[REDACTED] analysis [REDACTED]	2.60	1,190.00	3,094.00
03/02/21	M.J. Venditto	Analysis of insurance issues [REDACTED]	0.50	1,160.00	580.00
03/02/21	E. F. Vieyra	Plan schedule for opposition to motions to dismiss.	0.80	540.00	432.00
03/02/21	A. Kramer	Address Ch. 11 Plan questions re insurance from DPW with Aleali, Ricarte, Robertson et al	4.50	1,190.00	5,355.00
03/04/21	E. F. Vieyra	Analyze local rule regarding changes to schedule.	0.20	540.00	108.00
03/08/21	P.E. Breene	Review correspondence for	1.50	1,160.00	1,740.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		client, Kramer and DPW re insurance terms of plan; review plan language and changes from UCC.			
03/08/21	A. Kramer	Draft/revise response to S. Massman questions re plan terms [REDACTED]	0.80	1,190.00	952.00
03/09/21	M.J. Venditto	Email correspondence with A. Kramer and P. Breene regarding comments on draft of plan definitions of insurance policies	0.50	1,160.00	580.00
03/09/21	M.J. Venditto	Analyze issues relating to proposed plan treatment of insurance policies based on status	0.80	1,160.00	928.00
03/09/21	P.E. Breene	Work on plan issues; Review e-mails re insurance terms in plan.	1.00	1,160.00	1,160.00
03/09/21	A. Kramer	Revise C. Ricarte message to Massman re Plan issues re insurance	0.30	1,190.00	357.00
03/09/21	A. Kramer	email exchange with M. Venditto re C. Ricarte message to Massman re Plan issues re insurance	0.10	1,190.00	119.00
03/09/21	A. Kramer	Telephone conversation with C. Ricarte re Plan issues re insurance	0.30	1,190.00	357.00
03/10/21	P.E. Breene	Work on plan issues; Review e-mails re insurance terms in plan; Call with Kramer; Call with Kramer, Ricarte and Venditto; Call with RS Team, DPW Team and client re insurance provisions of plan.	3.50	1,160.00	4,060.00



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Date	Timekeeper	Description	Hours	Rate	Amount
03/10/21	M.J. Venditto	Participate in telephone conference call with Roxana Aleali and Christina Ricarte and Stephanie Massman, Eli Vonnegut and Zachary Levine, and Ann Kramer and Paul Breene to discuss treatment of insurance in plan of reorganization	1.00	1,160.00	1,160.00
03/10/21	A. Kramer	Conference call with Breene and Venditto re insurance terms in Plan to prepare for DPW call	1.00	1,190.00	1,190.00
03/10/21	A. Kramer	Telephone call with Breene re insurance terms in Plan	0.20	1,190.00	238.00
03/10/21	A. Kramer	email exchange with C. Ricarte and M. Venditto re insurance terms in Plan	0.30	1,190.00	357.00
03/10/21	M.J. Venditto	Participate in telephone conference call with C. Ricarte, A. Kramer and P. Breene to discuss treatment of insurance in plan of reorganization	0.90	1,160.00	1,044.00
03/10/21	A. Kramer	Conference call with DPW, Breene and Venditto re insurance terms in Plan	1.00	1,190.00	1,190.00
03/11/21	P.E. Breene	Work on plan terms.	1.00	1,160.00	1,160.00
03/11/21	E. F. Vieyra	Review and revise insurer service list.	0.20	540.00	108.00
03/11/21	A. Kramer	Conference call with R. Leveridge, Breene and Venditto re insurance terms in Plan	0.60	1,190.00	714.00
03/11/21	A. Kramer	email exchanges with DPW	0.30	1,190.00	357.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		and Venditto re insurance terms in Plan			
03/12/21	A. Kramer	email exchange with Breene and Venditto re Gilbert message re insurance terms in Plan	0.30	1,190.00	357.00
03/12/21	M.J. Venditto	Review revised plan definitions	0.50	1,160.00	580.00
03/12/21	A. Kramer	email exchanges with Massman and Levine re Plan terms re insurance and communications with Gilbert firm re same	0.40	1,190.00	476.00
03/12/21	A. Kramer	Conference call with R. Leveridge, Breene and Venditto re insurance terms in Plan	0.30	1,190.00	357.00
03/12/21	P.E. Breene	Review plan language and Gilbert e-mail [REDACTED] [REDACTED] [REDACTED] Call with L. Szymanski re catch-up re prior discussions; Call with Rick Leveridge, Kramer and Venditto re reference and [REDACTED] issues..	2.00	1,160.00	2,320.00
03/12/21	E. F. Vieyra	Planning and preparation for arbitration clause research.	0.90	540.00	486.00
03/12/21	M.J. Venditto	Participate in telephone conference call with Richard Leveridge, Ann Kramer and Paul Breene to review definitions of insurance policies in draft plan of	0.40	1,160.00	464.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		reorganization			
03/13/21	A. Kramer	E-mail exchanges with Aleali, Ricarte, DPW and Gilbert re plain terms re insurance	0.30	1,190.00	357.00
03/14/21	P.E. Breene	Review Gilbert red-line proposed changes to Plan; participate in call with DPW, Dechert, Kramer, and Ricarte; Draft proposed new definition of MDT Insurance Policies.	1.00	1,160.00	1,160.00
03/14/21	P.E. Breene	Review Gilbert E-mail and relevant plan provisions; Call with DPW, Dechert, Kramer, and UCC and AHC teams.	2.00	1,160.00	2,320.00
03/14/21	A. Kramer	Telecon with Ricarte re conference call with Quinn, Hudson, Shore, DPW team and Birnbaum re insurance terms in the plan	0.50	1,190.00	595.00
03/14/21	A. Kramer	Conference call with Quinn, Hudson, Shore, DPW team and Birnbaum re insurance terms in the plan	0.80	1,190.00	952.00
03/15/21	M.J. Venditto	Review insurance related plan issues from Stephanie Massman	1.50	1,160.00	1,740.00
03/15/21	P.E. Breene	Review and respond to e-mails re language changes in plan; Draft language changes; E-mails and calls with Kramer and Ricarte.	2.00	1,160.00	2,320.00
03/15/21	P.E. Breene	Review and respond to e-mails re language changes in plan.	1.00	1,160.00	1,160.00
03/16/21	S. B. Rhea	Identify recently filed	0.50	290.00	145.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Disclosure Statements by multiple parties for attorney review in anticipation of further case development.			
03/17/21	A. Kramer	Telephone call with Ricarte re plan negotiations	0.20	1,190.00	238.00
03/18/21	A. Kramer	Begin review of Plan for insurance issues	2.30	1,190.00	2,737.00
03/19/21	M.J. Venditto	Review and analysis of Plan of Reorganization provisions relating to insurance policy and proceeds	5.00	1,160.00	5,800.00
03/23/21	A. Kramer	email exchanges and telephone calls with DPW and client re K. Quinn message re open issues with plan	0.60	1,190.00	714.00
03/23/21	P.E. Breene	Call with Kramer and Venditto re insurance provisions of plan.	1.30	1,160.00	1,508.00
03/23/21	M.J. Venditto	Review and comment on draft of plan of reorganization	4.90	1,160.00	5,684.00
03/23/21	M.J. Venditto	Participate in telephone conference call with A. Kramer and P. Breene to review comments on insurance issues in draft of plan of reorganization	0.70	1,160.00	812.00
03/23/21	M.J. Venditto	Review comments and questions from counsel for the Ad Hoc Group on insurance issues in draft of plan of reorganization	0.40	1,160.00	464.00
03/23/21	M.J. Venditto	Review and comment on draft of insurance "punch list" requested by Roxana Aleali	0.40	1,160.00	464.00



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Date	Timekeeper	Description	Hours	Rate	Amount
03/23/21	A. Kramer	Conference call with Breene and Venditto re Plan provisions related to insurance	1.30	1,190.00	1,547.00
03/23/21	A. Kramer	Respond to R. Aleali re open insurance issues with plan	1.20	1,190.00	1,428.00
03/23/21	A. Kramer	Telephone conversation with C. Ricarte re Plan provisions related to insurance	0.60	1,190.00	714.00
03/23/21	A. Kramer	Research/respond to questions re [REDACTED] notice re [REDACTED] policies	0.60	1,190.00	714.00
03/23/21	P.E. Breene	Meet and confer with insurance companies.	0.20	1,160.00	232.00
03/24/21	M.J. Venditto	Review questions and comments from Christina Ricarte on insurance issues punchlist	0.60	1,160.00	696.00
03/24/21	M.J. Venditto	Review and comment on draft memorandum to Roxana Aleali	0.50	1,160.00	580.00
03/24/21	M.J. Venditto	Participate in telephone conference call with M. Huebner, S. Massman, D. Kratzer, K. Quinn, S. Birnbaum, S. Roitman, R. Shore, J. Hudson, A Kramer and P. Breene to discuss Ad Hoc Committee's comments on insurance treatment in plan	1.00	1,160.00	1,160.00
03/24/21	A. Kramer	Telephone conversation with C. Ricarte re plan insurance provisions	0.80	1,190.00	952.00
03/24/21	A. Kramer	Zoom conference with AHC	1.00	1,190.00	1,190.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Gilbert team, M. Huebner, S. Birnbaum et al re plan insurance provisions			
03/24/21	A. Kramer	Finish review of Plan terms re insurance	1.80	1,190.00	2,142.00
03/24/21	A. Kramer	email exchange with Ricarte re questions from Massman and Aleali re open plan issues	0.40	1,190.00	476.00
03/24/21	A. Kramer	Draft memo to client re comments/concerns re Plan terms re insurance	3.10	1,190.00	3,689.00
03/24/21	P.E. Breene	Call with DPW, Dechert, Gilbert, Kramer and Venditto re AHC issues with plan.	1.00	1,160.00	1,160.00
03/25/21	P.E. Breene	Call with client and DPW team re "Open Issues" in Plan and Kramer memo re Insurance issues in Plan.	1.00	1,160.00	1,160.00
03/25/21	P.E. Breene	Review Kramer memo re Insurance issues in Plan.	0.50	1,160.00	580.00
03/25/21	M.J. Venditto	Review and revise draft of memorandum outlining unresolved insurance issues in the plan	0.50	1,160.00	580.00
03/25/21	A. Kramer	Conference call with Aleali, Ricarte, Massman and Klein re open insurance issues in Plan	1.00	1,190.00	1,190.00
03/25/21	A. Kramer	Telephone call with Ricarte re open insurance issues in Plan	0.20	1,190.00	238.00
03/25/21	A. Kramer	Review Disclosure Statement re insurance issues	0.40	1,190.00	476.00
03/25/21	A. Kramer	Telephone conversation with S. Massman re memo re Plan	0.40	1,190.00	476.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		insurance issues			
03/26/21	E. Sanroman	Prepare ESI for review as requested by A. Crawford.	0.30	420.00	126.00
03/26/21	A. Kramer	Canada status call with Stikeman, Ricarte and Robertson	0.60	1,190.00	714.00
03/26/21	A. Kramer	Telephone conversation with S. Birnbaum re open Plan issues	0.30	1,190.00	357.00
03/26/21	A. Kramer	Telephone conversation with C. Ricarte re open Plan issues, calls with Birnbaum and Massman	0.80	1,190.00	952.00
03/29/21	M.J. Venditto	Review proposed modifications to insurance definitions in plan of reorganization	0.80	1,160.00	928.00
03/29/21	P.E. Breene	Review AHC red-line of Plan re insurance changes.	1.00	1,160.00	1,160.00
03/29/21	A. Kramer	email exchanges re Gilbert comments on Plan with client, DPW, Breene and Venditto	0.50	1,190.00	595.00
03/30/21	M.J. Venditto	Review and comment on modifications and revisions to the Plan from the Ad Hoc Committee	1.80	1,160.00	2,088.00
03/30/21	P.E. Breene	Review DPW comments on AHC red-line of Plan re insurance changes; Review Christina Ricarte comments and Venditto comments..	1.00	1,160.00	1,160.00
03/30/21	P.E. Breene	Review Gilbert insurance changes with DPW, Dechert, Client	1.00	1,160.00	1,160.00



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Date	Timekeeper	Description	Hours	Rate	Amount
03/30/21	A. Kramer	Analysis and revision of Gilbert revisions to Plan provisions re insurance	1.70	1,190.00	2,023.00
03/30/21	A. Kramer	Review of Ricarte and DPW comments and revisions to Gilbert revisions to Plan provisions re insurance	0.70	1,190.00	833.00
03/30/21	M.J. Venditto	Participate in telephone conference call with S. Massman, R. Aleali, C. Riicarte and A. Kramer to review proposals from Ad Hoc Committee on insurance issues in draft of plan of reorganization	0.60	1,160.00	696.00
03/30/21	A. Kramer	Conference call with Aleali, Ricarte, Birnbaum and Massman re Gilbert revisions to Plan provisions re insurance	1.00	1,190.00	1,190.00
03/31/21	P.E. Breene	Review DPW comments changes from 3/30 call.	0.30	1,160.00	348.00
03/31/21	A. Kramer	E-mail exchange with S. Massman re Plan revisions re insurance	0.30	1,190.00	357.00
Totals			86.40		99,168.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	37.30 hrs @ \$	1,190.00 / hr	44,387.00
Paul E. Breene	22.30 hrs @ \$	1,160.00 / hr	25,868.00
Michael J. Venditto	23.30 hrs @ \$	1,160.00 / hr	27,028.00



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Timekeeper	Hours	Rate	Total
Lisa A. Szymanski	0.60 hrs @ \$	800.00 / hr	480.00
Elizabeth F. Vieyra	2.10 hrs @ \$	540.00 / hr	1,134.00
Enrique Sanroman	0.30 hrs @ \$	420.00 / hr	126.00
Shikendra B. Rhea	0.50 hrs @ \$	290.00 / hr	145.00
Total Professional Services			99,168.00

INVOICE SUMMARY

Fees	\$ 99,168.00
Less 14% Fee Discount	\$ (13,883.52)
Total Fees	\$ 85,284.48

TOTAL CURRENT INVOICE DUE \$ 85,284.48

Total Amount Due \$ 85,284.48



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Invoice Number: **3389048**
Invoice Date: **4/21/2021**
Client Number: **395187**
Matter Number: **395187.60005**

Client File No.: 20210003077

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH March 31, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
03/01/21	P.E. Breene	Calls with team re discovery issues; Assemble team for briefing; Work on revision of letter to court and scheduling order.	1.50	1,160.00	1,740.00
03/01/21	N. Sooy	Analyze settlement agreement to apply redactions [REDACTED] at request of attorney L Szymanski	0.80	380.00	304.00
03/02/21	P.E. Breene	Calls with co-plaintiffs; Revise scheduling order and send to defendants; Review discovery issues re custodians to be searched.	2.50	1,160.00	2,900.00
03/02/21	L.A. Szymanski	Review redactions to Zurich settlement agreement made by paralegal N. Sooy for purposes of sharing w/ creditor committee and communications w/ A. Kramer re: same.	0.50	800.00	400.00
03/02/21	S. B. Rhea	Finalize and submit Notice of Appearance as to (E. Vieyra) in accordance with local rules.	0.20	290.00	58.00
03/02/21	M.J. Venditto	Review and comment on draft correspondence to Judge	0.20	1,160.00	232.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Drain			
03/02/21	M.J. Venditto	Participate in telephone conference call of counsel for Plaintiffs in the adversary proceeding to discuss response to proposal from counsel for Defendants	0.30	1,160.00	348.00
03/02/21	L.A. Szymanski	Phone call w/ P. Breene re: leading briefing team on insurers' motions to dismiss; follow up call w/ L. Vieyra re: same.	0.50	800.00	400.00
03/02/21	A. Kramer	Address dismissal demand from K. Wilson re 1815 Zurich policy with L. Szymanski and committees	0.60	1,190.00	714.00
03/03/21	P.E. Breene	Further work on discovery issues; Further work on negotiations of scheduling order and Drain letter; Call with co-plaintiff counsel.	1.50	1,160.00	1,740.00
03/04/21	P.E. Breene	Finalize letter and e-mail to Court; Calls and e-mails with S. Rhea re same; E-mail with K. Benedict re procedure; E-mail to Judge Drain; Review discovery issues.	2.00	1,160.00	2,320.00
03/04/21	A. Kramer	Conference call re insurance document search process with Hoff, Breene and Crawford	0.60	1,190.00	714.00
03/04/21	L.A. Szymanski	Identify briefing team to respond to Insurers Motions' to Dismiss and communications re: same to A. Kramer & P. Breene.	0.70	800.00	560.00



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Date	Timekeeper	Description	Hours	Rate	Amount
03/04/21	A. Crawford	Prepare for and participate in call with client regarding discovery protocols.	2.00	650.00	1,300.00
03/04/21	L.A. Szymanski	Review Judge Drain rules to determine how to file proposed scheduling order & letter & communications w/ RS team re: same.	0.50	800.00	400.00
03/05/21	P.E. Breene	Calls with client and team re discovery issues; Call with R. Leveridge re discovery issues; Review existing search terms document; Send search terms to Leveridge; Draft e-mail and send entered scheduling order to all parties.	2.50	1,160.00	2,900.00
03/05/21	N. Sooy	Analyze communications to identify Marsh production documents for attorneys A Kramer and A Crawford	0.40	380.00	152.00
03/05/21	A. Kramer	Conference call with Ricarte, Hoff, Breene and Crawford re document production to insurers, hosting, privilege etc	0.50	1,190.00	595.00
03/05/21	A. Crawford	Prepare for and participate in call regarding discovery protocols and begin review document production from Marsh.	3.30	650.00	2,145.00
03/05/21	N. Sooy	Research [REDACTED] [REDACTED] [REDACTED]	0.90	380.00	342.00
03/07/21	A. Kramer	Review/forward Auslander	0.20	1,190.00	238.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		letter re AIG umbrella policy			
03/07/21	A. Kramer	email exchange with K. Benedict re [REDACTED]	0.10	1,190.00	119.00
03/08/21	P.E. Breene	Review correspondence re discovery issues; Custodian sweeps; and review search terms.	0.50	1,160.00	580.00
03/08/21	L.A. Szymanski	Review previous briefing on motion to withdraw the reference in preparation for responding to same.	2.20	800.00	1,760.00
03/08/21	A. Kramer	Review/revise DPW draft of [REDACTED]	0.20	1,190.00	238.00
03/08/21	A. Crawford	Review correspondence from counsel for AD Hoc committee.	0.30	650.00	195.00
03/08/21	A. Kramer	Draft cover note to Gilbert re draft of [REDACTED]	0.10	1,190.00	119.00
03/08/21	A. Kramer	email exchange with Ricarte, DPW, Dechert re draft of [REDACTED]	0.10	1,190.00	119.00
03/09/21	P.E. Breene	Continued work on discovery issues; Custodian sweeps; and review search terms.	1.00	1,160.00	1,160.00
03/09/21	A. Crawford	Review and draft correspondence regarding potential custodians for personal jurisdiction discovery.	0.90	650.00	585.00
03/10/21	P.E. Breene	Continued work on discovery issues; Custodian sweeps; and review search terms; E-	1.00	1,160.00	1,160.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		mails with Hoff and Crawford re call with Committees.			
03/10/21	L.A. Szymanski	Review briefings re: motion to dismiss due to arbitration clause in preparation for responding to insurer motions to dismiss.	1.40	800.00	1,120.00
03/10/21	A. Crawford	Prepare for and participate in call with committees regarding personal jurisdiction search terms.	2.40	650.00	1,560.00
03/11/21	L.A. Szymanski	Communications w/ C. Lewis (London) re: affidavit of service on HDI in UK.	0.10	800.00	80.00
03/11/21	L.A. Szymanski	Communications w/ RS team re: service on Luxembourg carriers.	0.20	800.00	160.00
03/11/21	A. Kramer	Conference call and email exchange with Venditto, Breene and Szymanski re [REDACTED]	0.80	1,190.00	952.00
03/11/21	L.A. Szymanski	Review background materials in preparation for and participate in conference call w/ M. Venditto & A. Kramer [REDACTED]	1.30	800.00	1,040.00
03/11/21	A. Crawford	Review case materials and memorandums regarding personal jurisdiction and correspond with RS and outside counsel regarding the same.	3.75	650.00	2,437.50
03/11/21	A. Kramer	email exchange with Breene	0.30	1,190.00	357.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		and Crawford re search terms etc for personal jurisdiction searches			
03/11/21	P.E. Breene	Continued work on discovery issues; Custodian sweeps; and review search terms; Work on research re core v non-core issues.	2.00	1,160.00	2,320.00
03/11/21	L.A. Szymanski	Communications w/opposing counsel re: service on Luxembourg carriers.	0.20	800.00	160.00
03/12/21	L.A. Szymanski	Communications w/ C. Lewis (London) re: Affidavit of Service on HDI in UK.	0.10	800.00	80.00
03/12/21	L.A. Szymanski	Communications w/ C. Nitsche re: letter from German authorities.	0.10	800.00	80.00
03/12/21	A. Crawford	Begin review of personal jurisdiction search terms provided by the committees.	0.50	650.00	325.00
03/12/21	L.A. Szymanski	Review letter from German Authorities re: service on HDI in Germany.	0.10	800.00	80.00
03/12/21	C. Lewis	Considering position re service on branch of UK company, reviewing authorities, amending affidavit of service, liaising with solicitor regarding witnessing affidavit, email to LSzymanski.	1.70	555.00	943.50
03/12/21	L.A. Szymanski	Phone call w/ P. Breene in advance of call w/ R. Leveridge re: discussion on tweaking language of plan to [REDACTED]	0.20	800.00	160.00



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Date	Timekeeper	Description	Hours	Rate	Amount
03/13/21	E. F. Vieyra	Research about [REDACTED] [REDACTED] in preparation for motions to dismiss	0.90	540.00	486.00
03/13/21	L.A. Szymanski	Research/analyze relevant law in preparation for responding to anticipated Motions to Dismiss.	1.30	800.00	1,040.00
03/14/21	L.A. Szymanski	Research/analyze relevant law in preparation for responding to anticipated Motions to Dismiss.	3.30	800.00	2,640.00
03/15/21	L.A. Szymanski	Communications w/ C. Lewis (London) re: Affidavit of Service on HDI in UK.	0.10	800.00	80.00
03/15/21	P.E. Breene	Review Drain and SDNY rules re status conference and submission or meet and confer with opposing counsel before conference	0.50	1,160.00	580.00
03/15/21	P.E. Breene	Review briefing from [REDACTED] [REDACTED] in preparation for drafting respond to expected April 5 motion to remove reference and enforce arbitration clauses.	1.50	1,160.00	1,740.00
03/15/21	P.E. Breene	Call with R. Leveridge of AHC re preparation and strategy for Drain conference.	0.70	1,160.00	812.00
03/15/21	A. Kramer	E-mail exchange with A. Crawford re case management proposal form	0.10	1,190.00	119.00
03/15/21	P.E. Breene	Conference call with R. Hoff and A Crawford re searches	0.50	1,160.00	580.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		of custodian's files and adding additional custodians and determining search terms for searches of custodians' records			
03/15/21	E. F. Vieyra	Research bankruptcy law jurisdiction in preparation for responding to anticipated Motions to Dismiss	0.90	540.00	486.00
03/15/21	C. Lewis	Arranging witness of affidavit, scanning and email to LSzymanski	0.80	555.00	444.00
03/15/21	K. A. Morales	Review local SDNY rules and Judge Drain's chambers in relation to initial pre-trial conference.	0.30	515.00	154.50
03/15/21	M.J. Venditto	Draft proposal for pre-trial order for consideration by Defendants	0.50	1,160.00	580.00
03/15/21	M.J. Venditto	Preparing for Court mandated initial pre-trial conference	0.50	1,160.00	580.00
03/15/21	L.A. Szymanski	Research/analyze relevant law in preparation for responding to anticipated Motions to Dismiss.	3.00	800.00	2,400.00
03/15/21	N. Sooy	Research [REDACTED] [REDACTED] for L Szymanski to review in anticipation of insurance companies' responses to adversary complaint	0.60	380.00	228.00
03/15/21	N. Sooy	Research briefing requested by attorney L Szymanski filed [REDACTED] [REDACTED] [REDACTED]	0.40	380.00	152.00



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Date	Timekeeper	Description	Hours	Rate	Amount
03/15/21	A. Crawford	Review and analyze proposed search terms related to arguments supporting personal jurisdiction over all defendants and prepare for and participate in call regarding the same..	4.00	650.00	2,600.00
03/15/21	P.E. Breene	E-mails to team members re assignments.	0.30	1,160.00	348.00
03/15/21	M.J. Venditto	Review and respond to email received from Paul Breene regarding initial pre-trial conference	0.20	1,160.00	232.00
03/16/21	L.A. Szymanski	Communications w/ C. Nitsche re: service on HDI in Germany.	0.10	800.00	80.00
03/16/21	E. F. Vieyra	Planning conference call with L. Szymanski, A. Crawford, and K. Morales for motions to dismiss research.	1.10	540.00	594.00
03/16/21	K. A. Morales	Conference call with RS team re: objection to motion to withdraw the reference, objection to motion to dismiss/arbitration issue, drafting plan, and deadlines (1.1); Email to RS team re: purdue bankruptcy generally (.2).	1.30	515.00	669.50
03/16/21	E. F. Vieyra	Analyze background factual information about insurance program in preparation for motions to dismiss.	1.20	540.00	648.00
03/16/21	A. Crawford	Review and analyze scope of	5.20	650.00	3,380.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		prior protective orders in the bankruptcy case in support of draft case management and scheduling order.			
03/16/21	L.A. Szymanski	Review Affidavit of Service on HDI in UK in preparation for filing.	0.10	800.00	80.00
03/16/21	M.J. Venditto	Review of bankruptcy court jurisdictional issues and outline arguments for opposition to anticipated motion to dismiss	1.10	1,160.00	1,276.00
03/16/21	P.E. Breene	Review Chapter 11 Protective Order.	1.20	1,160.00	1,392.00
03/16/21	M.J. Venditto	Review and comment on proposal for protective order	0.60	1,160.00	696.00
03/16/21	P.E. Breene	E-mail to team re assignments.	0.30	1,160.00	348.00
03/16/21	P.E. Breene	E-mails with Leveridge re strategy.	0.20	1,160.00	232.00
03/16/21	P.E. Breene	E-mail to Kramer re call with Committee and agreed upon next steps.	0.30	1,160.00	348.00
03/16/21	P.E. Breene	Call with Leveridge.	0.50	1,160.00	580.00
03/16/21	P.E. Breene	Call with Venditto and Committee re next steps pre-status conference.	0.60	1,160.00	696.00
03/16/21	M.J. Venditto	Participate in telephone conference call of Plaintiffs' counsel to discuss preparations for initial pre-trial conference	0.60	1,160.00	696.00
03/16/21	A. Kramer	Address protective order application to Adv Proceeding	0.40	1,190.00	476.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		with Breene, Vendito, Crawford and K. Benedict			
03/16/21	S. B. Rhea	Finalize and submit Affidavit of Service on HDI in the UK in accordance with local rules.	0.20	290.00	58.00
03/16/21	L.A. Szymanski	Research/analyze relevant law in preparation for responding to anticipated Motions to Dismiss.	4.90	800.00	3,920.00
03/16/21	L.A. Szymanski	Participate in conference call w/ A. Crawford, K. Morales & L. Vieyra re: preparing draft oppositions to anticipated motions to dismiss.	1.10	800.00	880.00
03/17/21	K. A. Morales	Emails RS team current information about bankruptcy case.	0.20	515.00	103.00
03/17/21	P.E. Breene	Conference call with Hoff and Crawford re custodian discovery and search terms.	0.60	1,160.00	696.00
03/17/21	P.E. Breene	Call with DPW, Kramer, Venditto, Dechert, client and team re document production and scope of available electronic documents.	0.70	1,160.00	812.00
03/17/21	P.E. Breene	Draft, Review and revise e- mail to insurance company counsel re proposal for Drain conference.	1.30	1,160.00	1,508.00
03/17/21	P.E. Breene	Call with Venditto, Kramer, and Committee representatives re planning for status conference.	0.40	1,160.00	464.00
03/17/21	E. F. Vieyra	Analyze Project Windsor documents for factual	0.20	540.00	108.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		familiarization for motions to dismiss.			
03/17/21	E. F. Vieyra	Analyze bankruptcy documents (First Day Declaration, Disclosure Statement, and Bankruptcy Plan) to develop factual background for motions to dismiss.	1.70	540.00	918.00
03/17/21	M.J. Venditto	Review and comment on draft of Plaintiffs' Proposed Pretrial Scheduling Order	0.30	1,160.00	348.00
03/17/21	M.J. Venditto	Participate in telephone conference call with Kathryn Benedict, ; Chautney Oluwole, Sara Roitman, Sheila Birnbaum, Robert Hoff, Christina Ricarte, Anne Kramer, Paul Breene, and Anthony Crawford to discuss initial document production	0.70	1,160.00	812.00
03/17/21	A. Kramer	Conference call with Ricarte, DPW, Dechert, Breene, Crawford and Venditto re initial productions to insurers, scheduling order	0.70	1,190.00	833.00
03/17/21	A. Kramer	E-mail exchange with A. DePalma, C. Oluwole and C. Ricarte re data room materials on insurance	0.20	1,190.00	238.00
03/17/21	A. Kramer	Conference call with committees, Breene and Venditto re message to insurers, scheduling order	0.20	1,190.00	238.00
03/17/21	S. B. Rhea	Multiple telephone calls to National Archives, attempt to	0.20	290.00	58.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		[REDACTED]			
03/17/21	P.E. Breene	Review Chapter 11 Protective Order.	0.70	1,160.00	812.00
03/17/21	M.J. Venditto	Participate in telephone conference call with Richard Leveridge, Shawn Hanson, Jenna Hudson, Anne Kramer and Paul Breene to discuss pre-trial scheduling proposal to defendants	0.30	1,160.00	348.00
03/17/21	S. DeMaris	SZYMANSKI-Primary Law Research: [REDACTED]	0.50	355.00	177.50
03/17/21	L.A. Szymanski	Research/analyze relevant law in preparation for responding to anticipated Motions to Dismiss.	5.00	800.00	4,000.00
03/17/21	P.E. Breene	E-mail re team assignments.	0.20	1,160.00	232.00
03/17/21	P.E. Breene	E-mail to Kramer re plans for conference and explanation of attachments.	0.30	1,160.00	348.00
03/17/21	A. Crawford	Prepare for and participate in internal and external call regarding discovery and document search terms.	4.60	650.00	2,990.00
03/17/21	M.J. Venditto	Review and revise draft correspondence to defense counsel regarding draft of pre-trial scheduling order	0.30	1,160.00	348.00
03/18/21	E. F. Vieyra	Conference with L.	0.80	540.00	432.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Szymanski and E. Kim about [REDACTED] [REDACTED] for motions to dismiss.			
03/18/21	E. F. Vieyra	Analyze New York case law about [REDACTED] [REDACTED] for motions to dismiss.	2.40	540.00	1,296.00
03/18/21	A. Crawford	Review and analyze memorandums and caselaw regarding [REDACTED] [REDACTED] in support of opposition to withdraw the reference.	7.70	650.00	5,005.00
03/18/21	E. F. Vieyra	Preliminary review of tower policies [REDACTED] provisions for motions to dismiss.	0.80	540.00	432.00
03/18/21	A. Kramer	E-mail exchange with Breene re Gilbert request re J. Jiminez	0.10	1,190.00	119.00
03/18/21	P.E. Breene	Review custodians' electronic files and mark files to be searched by R. Hoff and team.	0.70	1,160.00	812.00
03/18/21	P.E. Breene	Call with Hoff, Crawford, and Rush and Leveridge from Gilbert re discovery of custodians and search terms as well as searches of paper documents.	0.80	1,160.00	928.00
03/18/21	A. Kramer	Search for [REDACTED] [REDACTED] for personal jurisdiction opposition	0.60	1,190.00	714.00
03/18/21	S. DeMaris	SZYMANSKI-Secondary sources research: Search for	0.30	355.00	106.50



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Date	Timekeeper	Description	Hours	Rate	Amount
		[REDACTED]			
03/18/21	S. DeMaris	SZYMANSKI-Primary Law Research: Search for he [REDACTED]	0.50	355.00	177.50
03/18/21	L.A. Szymanski	Research/analyze relevant law in preparation for responding to anticipated Motions to Dismiss.	6.00	800.00	4,800.00
03/18/21	L.A. Szymanski	Call w/ E. Kim & L. Vieyra to discuss review of policy provisions in preparation for responding to Motions to Dismiss.	0.80	800.00	640.00
03/18/21	E. Y. Kim	Call with L. Szymanski and E. Vieyra regarding analysis of policies at issue in adversary complaint.	0.80	535.00	428.00
03/19/21	L.A. Szymanski	Email w/ C. Nitsche re: Luxembourg proof of service and review of same.	0.20	800.00	160.00
03/19/21	E. F. Vieyra	Analyze attorney memoranda about [REDACTED]	0.70	540.00	378.00
03/19/21	A. Crawford	Review and analyze memorandums and caselaw regarding [REDACTED] in support of opposition to withdraw the reference.	8.00	650.00	5,200.00
03/19/21	A. Kramer	E-mail exchange with R. Leveridge re search for [REDACTED]	0.10	1,190.00	119.00



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Date	Timekeeper	Description	Hours	Rate	Amount
03/19/21	A. Kramer	Search for personal jurisdiction documents, Marsh production	1.40	1,190.00	1,666.00
03/19/21	A. Kramer	E-mail exchanges with C. Ricarte re disclosure of documents to committees for personal jurisdiction motion	0.10	1,190.00	119.00
03/19/21	A. Kramer	email exchanges with Breene, Venditto and Leveridge re Liberty letter re motions, status conference	0.50	1,190.00	595.00
03/19/21	A. Kramer	Telephone call (.30) and email exchanges with Ricarte re Liberty letter re motions, status conference	0.60	1,190.00	714.00
03/19/21	E. Y. Kim	Analyze insuring agreement of policies at issue in the adversary complaint regarding [REDACTED]	1.40	535.00	749.00
03/19/21	L.A. Szymanski	Attention to communications from opposing counsel re: intent to file motion to withdraw reference on Monday, 3/21.	0.20	800.00	160.00
03/19/21	P.E. Breene	Call with Leveridge to prepare for Pre-Trial Conference	0.50	1,160.00	580.00
03/19/21	P.E. Breene	Read core v. non-core materials provided by Lisa S.	1.50	1,160.00	1,740.00
03/19/21	C. Nitsche	Service to Luxembourg: Follow-up with authorities re confirmation; email and	0.40	565.00	226.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		documents to L. Sysmanski			
03/19/21	P.E. Breene	Call with Lisa S. and Elizabeth V. re assignments briefing and setting deadlines for briefs.	0.50	1,160.00	580.00
03/19/21	L.A. Szymanski	Conference call w/ P. Breene & L. Vieyra re: strategy re: oppositions to MTD.	0.50	800.00	400.00
03/19/21	L.A. Szymanski	Draft emails to RS team re: strategy for opposition to MTD.	1.10	800.00	880.00
03/19/21	P.E. Breene	Call with Venditto re response to Liberty letter and conference issues.	0.20	1,160.00	232.00
03/19/21	P.E. Breene	E-mail exchanges with Kramer and Venditto re response to Liberty letter and conference issues.	0.30	1,160.00	348.00
03/19/21	M.J. Venditto	Review and revise draft notice regarding March 24 pre-trial conference	0.30	1,160.00	348.00
03/19/21	M.J. Venditto	Review letter from defense counsel letter regarding March 24 pre-trial conference	0.50	1,160.00	580.00
03/19/21	M.J. Venditto	Review correspondence from defense attorneys regarding motion to withdraw reference	0.20	1,160.00	232.00
03/19/21	M.J. Venditto	Review outline regarding opposition to defense motions	0.30	1,160.00	348.00
03/20/21	P.E. Breene	Revise draft of letter to carriers several times	1.00	1,160.00	1,160.00
03/20/21	P.E. Breene	Numerous e-mail exchanges with RS and Gilbert teams re letter response to carriers	1.00	1,160.00	1,160.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		3/19 letter.			
03/20/21	M.J. Venditto	Review and revise draft response to defense counsel letter regarding March 24 pre-trial conference	0.50	1,160.00	580.00
03/20/21	A. Kramer	email exchanges with C. Ricarte, DPW and Dechert re message to insurers re pretrial conference etc	0.20	1,190.00	238.00
03/20/21	A. Kramer	email exchanges with R. Leveridge, Breene and Venditto re response to insurers re pretrial conference etc	0.40	1,190.00	476.00
03/20/21	A. Kramer	Review/revise response to insurers re pretrial conference etc	0.30	1,190.00	357.00
03/21/21	A. Kramer	Telephone calls and email exchanges with P. Breene re response letter to insurers	0.20	1,190.00	238.00
03/21/21	A. Kramer	Conference call with Ricarte, Benedict, Tobak, Kaminsky, Roitman and Breene re response to insurers, strategy with J. Drain	0.70	1,190.00	833.00
03/21/21	A. Kramer	Review/revise response letter to insurers	1.30	1,190.00	1,547.00
03/21/21	E. Y. Kim	Analyze insuring agreement of policies at issue in the adversary complaint regarding [REDACTED]	3.50	535.00	1,872.50



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Date	Timekeeper	Description	Hours	Rate	Amount
03/21/21	P.E. Breene	Call with DPW, Dechert, Kramer, and Christina R. re strategy and planning for motions to stay and motion to withdraw the reference.	0.70	1,160.00	812.00
03/21/21	P.E. Breene	Revise Gilbert Version of draft letter to Liberty Counsel; Gather comments from committees, revise letter and send to insurance companies.	0.80	1,160.00	928.00
03/21/21	P.E. Breene	Revise Gilbert Version of draft letter to Liberty Counsel; Send same to Kramer.	1.00	1,160.00	1,160.00
03/21/21	E. Y. Kim	Draft spreadsheet regarding analysis of insuring agreement of policies at issue in the adversary complaint regarding [REDACTED]	1.30	535.00	695.50
03/21/21	A. Kramer	Begin review of Plan for insurance issues.	3.20	1,190.00	3,808.00
03/22/21	E. F. Vieyra	Conference with L. Syzmanski, A. Crawford, and K. Morales about status of research and impending motion to withdraw the reference.	0.70	540.00	378.00
03/22/21	P.E. Breene	Team call re response to Liberty Mutual Motion To Withdraw Reference.	0.50	1,160.00	580.00
03/22/21	K. A. Morales	Conference call with Reed Smith team re: drafting	1.20	515.00	618.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		objection to motion to withdraw the reference (.7); Conference call with larger Reed Smith team re: strategy and timing of drafting same (.5).			
03/22/21	E. F. Vieyra	RS Team call to analyze Liberty brief and delegate tasks for drafting opposition.	0.50	540.00	270.00
03/22/21	P.E. Breene	Review Liberty Mutual Motion To Withdraw Reference.	0.60	1,160.00	696.00
03/22/21	P.E. Breene	Review Liberty Mutual Motion To Withdraw Reference.	0.60	1,160.00	696.00
03/22/21	E. F. Vieyra	Analyze Liberty motion to withdraw the reference.	0.60	540.00	324.00
03/22/21	E. Y. Kim	Follow up analysis of insuring agreements of policies at issue in the adversary complaint regarding [REDACTED]	0.90	535.00	481.50
03/22/21	S. B. Rhea	Finalize and submit correspondence to Judge Drain regarding scheduling and letter in opposition to adjournment of Pre-Trial Conference in accordance with local rules.	0.20	290.00	58.00
03/22/21	S. B. Rhea	Confer with Court Solutions customer service representative, arrange court appearances for P. Breene and A. Kramer for upcoming	0.60	290.00	174.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		hearing in accordance with Judge's rules.			
03/22/21	A. Kramer	Review index if insurance materials in DPW data room for production to Insurers	0.30	1,190.00	357.00
03/22/21	E. F. Vieyra	Analyze In re Hirsch case in preparation for motions to dismiss.	0.80	540.00	432.00
03/22/21	E. F. Vieyra	Analyze [REDACTED] in preparation for motions to dismiss.	0.80	540.00	432.00
03/22/21	E. F. Vieyra	Review Liberty letter about proposed motion.	0.30	540.00	162.00
03/22/21	E. F. Vieyra	Analyze attorney memorandum about [REDACTED]	0.90	540.00	486.00
03/22/21	P.E. Breene	Revise letter to Court and file and send same, including calls with J. Hudson; A. Crawford; S. Rhea; and E-mail exchanges with Kramer and Venditto re changes.	0.90	1,160.00	1,044.00
03/22/21	P.E. Breene	Draft letter to Court opposing insurance companies' letter asking to adjourn March 24 conference.	1.00	1,160.00	1,160.00
03/22/21	L.A. Szymanski	Read & analyze Liberty's Motion to Withdraw the Reference in preparation for RS all-hands call to discuss strategy for responding.	0.50	800.00	400.00
03/22/21	L.A. Szymanski	Conference call w/ RS Team re: Liberty's Objection to Motion to Withdraw	0.50	800.00	400.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Reference.			
03/22/21	L.A. Szymanski	Conference call w/ A. Crawford, L. Vieyra & K. Morales to discuss plan for draft Objection to Motion to Withdraw Reference.	0.70	800.00	560.00
03/22/21	L.A. Szymanski	Research/analyze relevant law in preparation for responding to Objection to Motion to Withdraw the Reference.	2.20	800.00	1,760.00
03/22/21	A. Kramer	Communications with Ricarte and DPW re insurers' response to Breene, letter to J. Drain re PreTrial Conf and schedule and Motion to Withdraw the Reference	0.40	1,190.00	476.00
03/22/21	A. Kramer	Review/revise draft response to Insurers letters to J. Drain re PreTrial Conf and schedule	0.30	1,190.00	357.00
03/22/21	E. Y. Kim	Revise spreadsheet regarding analysis of insuring agreement of policies at issue in the adversary complaint regarding [REDACTED]	0.90	535.00	481.50
03/22/21	E. Y. Kim	Internal team teleconference regarding strategy for opposition to motion to withdraw reference brief.	0.50	535.00	267.50
03/22/21	A. Crawford	Prepare for and participate in conference calls regarding	1.30	650.00	845.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		response in opposition to motion filed by Liberty Mutual.			
03/22/21	M.J. Venditto	Participate in telephone conference call with Breene, Kramer, Szymanski and Crawford to discuss opposition to defendant Liberty Mutual motion to withdraw the reference	0.60	1,160.00	696.00
03/22/21	M.J. Venditto	Review correspondence from Kim Marrkand to judge Drain regarding pre-trial	0.20	1,160.00	232.00
03/22/21	M.J. Venditto	Review and analysis of memorandum of law in support of motion of Liberty Mutual Insurance Company to withdraw the reference of the adversary proceeding from the Bankruptcy Court	2.30	1,160.00	2,668.00
03/22/21	M.J. Venditto	Review letter response from defendants' coordinating counsel regarding pre-trial conference	0.20	1,160.00	232.00
03/22/21	M.J. Venditto	Review comments from Richard Leveridge on defendants' correspondence	0.20	1,160.00	232.00
03/22/21	A. Kramer	Review Insurers letters to Breene and J. Drain re PreTrial Conf and schedule	0.30	1,190.00	357.00
03/22/21	A. Kramer	Team call re Liberty Motion to Withdraw the Reference	0.50	1,190.00	595.00
03/22/21	A. Kramer	Review Liberty Motion to Withdraw the Reference	0.40	1,190.00	476.00
03/22/21	P.E. Breene	Review (i) letter responding to Plaintiffs' 3/21 letter; and (ii)	0.40	1,160.00	464.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Letter to Judge Drain seeking to adjourn 3/24 conference.			
03/22/21	A. Kramer	Continue review of Plan for insurance issues.	3.70	1,190.00	4,403.00
03/23/21	A. Kramer	email exchanges with C. Ricarte, C. Oluwole, A. Crawford re due diligence insurance production list	0.20	1,190.00	238.00
03/23/21	K. A. Morales	Call with L. Szymanski re: drafting section of objection to motion to withdraw the reference (.1); Call with A. Crawford re: same (.1); Complete research re: stern/orion issues (.4); Email to RS team re: legislative history of stern (.2).	0.80	515.00	412.00
03/23/21	E. F. Vieyra	Analyze [REDACTED] in preparation for motion to withdraw reference.	0.10	540.00	54.00
03/23/21	A. Crawford	Review documents for potential voluntary production.	0.50	650.00	325.00
03/23/21	E. F. Vieyra	Analyze letters filed with court regarding motions and conferences.	0.20	540.00	108.00
03/23/21	E. F. Vieyra	Analyze Liberty motion to withdraw the reference in preparation for drafting opposition.	0.90	540.00	486.00
03/23/21	M.J. Venditto	Participate in telephone conference call of Plaintiffs' counsel to prepare for meet and confer with counsel for defendants	0.80	1,160.00	928.00
03/23/21	M.J. Venditto	Participate in telephonic	0.50	1,160.00	580.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		"meet and confer" of counsel to discuss issues to be addressed at pre-trial conference			
03/23/21	E. F. Vieyra	Draft outline of opposition to Liberty motion to withdraw the reference.	1.90	540.00	1,026.00
03/23/21	E. F. Vieyra	Research about limited jurisdictional discovery in preparation for status conference.	1.80	540.00	972.00
03/23/21	L.A. Szymanski	Create shell of Objection to Motion to Withdraw Reference and ID cases we may want to rely on in various sections.	1.60	800.00	1,280.00
03/23/21	P.E. Breene	Prepare for court conference.	6.50	1,160.00	7,540.00
03/23/21	A. Kramer	Meet and confer with insurers re discovery schedule	0.10	1,190.00	119.00
03/23/21	A. Kramer	Conference call with committees and RS team to prepare for Meet and confer with insurers re discovery schedule	0.40	1,190.00	476.00
03/23/21	S. DeMaris	SZYMANSKI(-Law/Legislative research: [REDACTED])	0.30	355.00	106.50
03/23/21	A. Crawford	Begin draft factual section of opposition to motion to withdraw the reference.	1.10	650.00	715.00
03/23/21	L.A. Szymanski	Attention to research issues needed by P. Breene for conference outline.	0.50	800.00	400.00
03/23/21	A. Kramer	Conference call with Breene	0.70	1,190.00	833.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		and Venditto to prepare for pre-trial conference			
03/23/21	A. Kramer	Review letters from insurers to court in advance of pre-trial conference	0.40	1,190.00	476.00
03/24/21	K. A. Morales	Review motion to withdraw the reference (2); Emails with E. Vieyra re: stern issues for objection to motion to withdraw the reference (.4).	2.40	515.00	1,236.00
03/24/21	E. F. Vieyra	Draft section of opposition brief [REDACTED]	3.30	540.00	1,782.00
03/24/21	E. F. Vieyra	Call with L. Szymanski regarding [REDACTED] briefing (.4).	0.40	540.00	216.00
03/24/21	E. F. Vieyra	Review and analyze [REDACTED] provisions in Liberty policy.	1.50	540.00	810.00
03/24/21	S. B. Rhea	Confer with Court Solutions customer service representative, arrange for additional court appearance for P. Breene for 10:00AM hearing in accordance with Judge's rules.	0.30	290.00	87.00
03/24/21	E. F. Vieyra	Research insurance case law generally about [REDACTED]	1.80	540.00	972.00
03/24/21	E. F. Vieyra	Research to distinguish cases cited in Liberty motion to withdraw.	1.80	540.00	972.00
03/24/21	L.A. Szymanski	Draft Objection to Motion to Withdraw Reference.	10.00	800.00	8,000.00
03/24/21	M.J. Venditto	Review and revise draft	0.20	1,160.00	232.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		correspondence to defense counsel			
03/24/21	P.E. Breene	Draft and finalize e-mail to all counsel re rescheduling of Pre-Trial conference.	0.40	1,160.00	464.00
03/24/21	M.J. Venditto	Participate in conference call among counsel for the Plaintiffs to prepare for conference with Judge Drain	1.10	1,160.00	1,276.00
03/24/21	M.J. Venditto	Telephone conversations with Dorothy Li, Paul Breene and Ann Kramer regarding re-scedhuling of initial pre-trial conference	0.40	1,160.00	464.00
03/24/21	P.E. Breene	Work on argument outline and calls with Leveridge to coordinate argument.	3.40	1,160.00	3,944.00
03/24/21	P.E. Breene	Call with Committee lawyers to prepare for Pre-Trial Conference.	0.60	1,160.00	696.00
03/24/21	A. Kramer	Communications with Breene, Venditto and Committees re new date for rescheduled Pretrial conference	0.50	1,190.00	595.00
03/24/21	A. Kramer	Conference call with Committees, Breene and Venditto re preparation for Pretrial conference	0.80	1,190.00	952.00
03/24/21	L.A. Szymanski	Conference call w/ L. Vieyra re: startegy for preparing Objection to Motion to Withdraw Reference and research needed for same.	0.40	800.00	320.00
03/24/21	A. Crawford	Revise factual section of opposition to motion to	2.40	650.00	1,560.00



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		withdraw the reference.			
03/24/21	A. Kramer	Telephone conversation with R. Shore the notes of meeting with B. Friedman (Gulf/Travelers)	0.10	1,190.00	119.00
03/24/21	E. Y. Kim	Legal research regarding [REDACTED] [REDACTED] [REDACTED] for opposition to motion to withdraw reference brief.	2.00	535.00	1,070.00
03/24/21	E. Y. Kim	Legal research regarding [REDACTED] for opposition to motion to withdraw reference brief.	1.20	535.00	642.00
03/24/21	M.J. Venditto	Review correspondence sent to Judge Drain by various defendants requesting stay of discovery	0.60	1,160.00	696.00
03/24/21	A. Kramer	email exchanges with Breene and Venditto re preparation for Pretrial conference	0.80	1,190.00	952.00
03/24/21	A. Kramer	Attend Pretrial conference (adjourned)	0.50	1,190.00	595.00
03/24/21	P.E. Breene	Attend cancelled pre-trial conference.	0.60	1,160.00	696.00
03/24/21	M.J. Venditto	Participate in pre-trial conference (telephonic) before Judge Drain	0.60	1,160.00	696.00
03/25/21	K. A. Morales	Review first day declaration, plan, and disclosure statement in main bankruptcy case.	3.60	515.00	1,854.00



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03/25/21	E. F. Vieyra	Draft section of opposition brief about efficiency considerations.	2.90	540.00	1,566.00
03/25/21	E. F. Vieyra	Conference call with RS Team to discuss bankruptcy plan as related to opposition brief.	0.80	540.00	432.00
03/25/21	E. F. Vieyra	Review draft abatement trust agreement for opposition to motion to withdraw the reference.	0.40	540.00	216.00
03/25/21	E. F. Vieyra	Analyze [REDACTED] clauses in Liberty policies in preparation for motions to dismiss.	1.00	540.00	540.00
03/25/21	P.E. Breene	Calls and e-mails re briefing schedule for Motion To Withdraw Reference.	0.50	1,160.00	580.00
03/25/21	M.J. Venditto	Review of Liberty's motion to withdraw the reference of the adversary proceeding	1.00	1,160.00	1,160.00
03/25/21	M.J. Venditto	Participate in telephone conference call with Kathryn Benedict, Marc Tobak, Benjamin Kaminetsky, Christina Ricarte, Anne Kramer, Paul Breene, and Lisa Symanski to discuss opposition to motion to withdraw the reference	0.60	1,160.00	696.00
03/25/21	E. F. Vieyra	Research about [REDACTED]	0.90	540.00	486.00
03/25/21	E. F. Vieyra	Call with L. Szymanski to discuss draft opposition brief and revision to same.	0.40	540.00	216.00
03/25/21	K. A. Morales	Draft sections of objection to	5.60	515.00	2,884.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		motion to withdraw the reference.			
03/25/21	P.E. Breene	Call with Client, DPW and RS Team re Opposition to Motion To Withdraw the Reference.	0.50	1,160.00	580.00
03/25/21	K. A. Morales	Attend conference call with Reed Smith team and Davis Polk team re: bankruptcy and plan information for purposes of adding information to the objection to withdraw the reference (.6); Call with Reed Smith team re: same and timeline of drafting objection (.7).	1.30	515.00	669.50
03/25/21	A. Kramer	Webex with Ricarte, DPW Team and RS briefing team re opposition to Motion to Withdraw the Reference re bankruptcy issues	0.60	1,190.00	714.00
03/25/21	L.A. Szymanski	Draft Objection to Motion to Withdraw Reference.	7.00	800.00	5,600.00
03/25/21	L.A. Szymanski	Call w/ DPW & RS teams re: arguments that can be made about [REDACTED] for purposes of drafting Objection to Motion to Withdraw the Reference.	0.50	800.00	400.00
03/25/21	S. B. Rhea	Finalize and submit Notice of Adjournment in accordance with local rules.	0.20	290.00	58.00
03/25/21	S. B. Rhea	Prepare initial draft of Notice of Adjournment for attorney review.	0.30	290.00	87.00
03/25/21	L.A. Szymanski	Call w/ RS brief team re:	0.70	800.00	560.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		arguments that can be made about [REDACTED] [REDACTED] for purposes of drafting Objection to Motion to Withdraw Reference.			
03/25/21	E. Y. Kim	Follow up legal research regarding [REDACTED] [REDACTED] for opposition to motion to withdraw reference brief.	2.10	535.00	1,123.50
03/25/21	E. Y. Kim	Follow up legal research regarding [REDACTED] [REDACTED] for opposition to motion to withdraw reference brief.	0.80	535.00	428.00
03/25/21	A. Crawford	Revise factual background and legal analysis sections of opposition brief	3.90	650.00	2,535.00
03/25/21	A. Crawford	Prepare for and participate in in organization calls regarding bankruptcy proceeding.	1.10	650.00	715.00
03/26/21	E. F. Vieyra	Analyze Liberty motion to withdraw the reference in preparation for revising opposition.	0.90	540.00	486.00
03/26/21	E. F. Vieyra	Analyze Liberty claims correspondence with Liberty for opposition to motion to withdraw.	0.70	540.00	378.00
03/26/21	P.E. Breene	Review documents re [REDACTED] [REDACTED]	0.50	1,160.00	580.00



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Date	Timekeeper	Description	Hours	Rate	Amount
03/26/21	D.H. Lang	Prepare opposing productions for review	1.00	475.00	475.00
03/26/21	E. F. Vieyra	Draft section about forum shopping for opposition brief to motion to withdraw.	1.40	540.00	756.00
03/26/21	E. F. Vieyra	Review and revise factual background section of opposition brief to motion to withdraw.	1.80	540.00	972.00
03/26/21	P.E. Breene	Call with RS Briefing Team and Stephanie Massman of DPW re [REDACTED]	0.50	1,160.00	580.00
03/26/21	A. Kramer	Conference call with S. Massman and RS Briefing team re [REDACTED] for opposition to Motion to Withdraw the Reference	0.50	1,190.00	595.00
03/26/21	K. A. Morales	Call with Davis Polk team and Reed Smith team re: information on plan to include in objection to motion to withdraw the reference.	0.50	515.00	257.50
03/26/21	L.A. Szymanski	Draft Objection to Motion to Withdraw Reference.	7.20	800.00	5,760.00
03/26/21	L.A. Szymanski	Participate in conference call w/ S. Massman (DPW) re: [REDACTED]	0.50	800.00	400.00
03/26/21	M.J. Venditto	Review and analysis of Liberty Mutual motion to withdraw reference of adversary proceeding	1.80	1,160.00	2,088.00
03/26/21	N. Sooy	Research for cases requested	1.60	380.00	608.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		by L Szymanski re [REDACTED]			
03/26/21	A. Crawford	Revise brief in opposition to motion to withdraw the reference	8.60	650.00	5,590.00
03/27/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference as per comments of A. Crawford & inserts prepared by K. Morales.	2.40	800.00	1,920.00
03/27/21	A. Crawford	Revise factual background section of opposition to motion to withdraw the reference.	0.70	650.00	455.00
03/28/21	A. Kramer	Review/revise draft opposition to motion to withdraw the reference	1.60	1,190.00	1,904.00
03/29/21	E. F. Vieyra	RS team call in plan revisions to brief in opposition to motion to withdraw.	1.10	540.00	594.00
03/29/21	P.E. Breene	Review and revise brief in opposition to motion to withdraw reference.	4.00	1,160.00	4,640.00
03/29/21	P.E. Breene	Call with Kramer, Venditto, Crawford and Szymanski re draft brief in opposition to motion to withdraw reference.	0.70	1,160.00	812.00
03/29/21	E. F. Vieyra	Conference call with L. Szymanski and A. Crawford to discuss revisions to brief in opposition to motion to compel.	1.10	540.00	594.00
03/29/21	E. F. Vieyra	Review comments from P.	0.60	540.00	324.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Breene and A. Kramer on draft opposition to motion to withdraw.			
03/29/21	E. F. Vieyra	Research about [REDACTED] case in preparation for opposition to motion to compel.	1.10	540.00	594.00
03/29/21	P.E. Breene	Call with J. Hudson and A. Liederman re Winterthur Swiss, improperly named as Tenecom f/k/a Winterthur Swiss.	0.30	1,160.00	348.00
03/29/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference as per comments of P. Breene, A. Kramer & M. Venditto.	3.40	800.00	2,720.00
03/29/21	M.J. Venditto	Review and comment on draft of Plaintiffs' Objection to Motion to Withdraw the Reference	2.40	1,160.00	2,784.00
03/29/21	L.A. Szymanski	Call w/ L. Vieyra & A. Crawford to discuss revisions to Objection to Motion to Withdraw Reference and drafting of arbitration brief.	1.20	800.00	960.00
03/29/21	L.A. Szymanski	Call w/ RS team to discuss revisions to Objection to Motion to Withdraw Reference.	0.60	800.00	480.00
03/29/21	M.J. Venditto	Participate in telephone conference call with P. Breene, A. Kramer, A. Crawford and L. Szymanski to discuss comments, edits and revisions to the draft of Plaintiffs' Objection to Motion	0.60	1,160.00	696.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		to Withdraw the Reference			
03/29/21	A. Crawford	Prepare for and participate in case strategy call.	1.20	650.00	780.00
03/29/21	A. Crawford	Revise factual background section of opposition to motion to withdraw the reference.	4.30	650.00	2,795.00
03/29/21	M.J. Venditto	Review of issues relating to dismissal of defendant Tenecom and substitution of Winterthur Swiss	0.30	1,160.00	348.00
03/29/21	A. Kramer	Internal team conference call re Opposition to Motion to withdraw reference	0.60	1,190.00	714.00
03/30/21	E. F. Vieyra	Draft headings and legal standards for shell brief opposing motion to compel arbitration.	1.20	540.00	648.00
03/30/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference as per comments of P. Breene, A. Kramer & M. Venditto.	7.00	800.00	5,600.00
03/30/21	M.J. Venditto	Review of legal research for Plaintiffs' Objection to Motion to Withdraw the Reference	2.10	1,160.00	2,436.00
03/30/21	A. Crawford	Revise factual background section of opposition to motion to withdraw the reference.	5.80	650.00	3,770.00
03/30/21	M.J. Venditto	Draft email to L. Szymanski regarding legal arguments in draft opposition to motion by Liberty mutual	0.20	1,160.00	232.00
03/31/21	A. Kramer	Communications with P. Breene re named parties	0.20	1,190.00	238.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		issues			
03/31/21	E. F. Vieyra	Research [REDACTED] in preparation for motions to compel arbitration.	1.50	540.00	810.00
03/31/21	P.E. Breene	Research re proper parties in caption (XL Switzerland and UAI).	0.50	1,160.00	580.00
03/31/21	P.E. Breene	Draft and send e-mail to all plaintiffs' counsel re explaining issues and setting up call.	0.40	1,160.00	464.00
03/31/21	L.A. Szymanski	Participate in conference call w/ RS Team & Committees re: strategy for attending to issues w/ parties named in complaint.	0.20	800.00	160.00
03/31/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference as per comments of P. Breene, A. Kramer & M. Venditto.	7.80	800.00	6,240.00
03/31/21	M.J. Venditto	Review and comment on draft discussion of [REDACTED] for opposition to Liberty's motion to withdraw the reference	1.30	1,160.00	1,508.00
03/31/21	N. Sooy	Research SDNY case to pull orders requested by attorney L. Szymanski for her review	0.20	380.00	76.00
03/31/21	M.J. Venditto	Review of [REDACTED]	2.00	1,160.00	2,320.00
03/31/21	L.A. Szymanski	Review and respond to email from M. Venditto re: [REDACTED]	0.20	800.00	160.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		[REDACTED]			
03/31/21	L.A. Szymanski	Phone call w/ L. Vieyra re: strategy for drafting template Opposition to Motion to Compel Arbitration.	0.50	800.00	400.00
03/31/21	E. Y. Kim	Legal research regarding Connecticut, New York, and Delaware statutes [REDACTED]	2.80	535.00	1,498.00
		[REDACTED]			
03/31/21	A. Crawford	Revise factual background section of opposition to motion to withdraw the reference.	5.60	650.00	3,640.00
Totals			379.15		306,460.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	28.70 hrs @ \$	1,190.00 / hr	34,153.00
Paul E. Breene	57.70 hrs @ \$	1,160.00 / hr	66,932.00
Michael J. Venditto	27.40 hrs @ \$	1,160.00 / hr	31,784.00
Lisa A. Szymanski	91.40 hrs @ \$	800.00 / hr	73,120.00
Anthony Crawford	79.15 hrs @ \$	650.00 / hr	51,447.50
Christina Nitsche	0.40 hrs @ \$	565.00 / hr	226.00
Catherine Lewis	2.50 hrs @ \$	555.00 / hr	1,387.50



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Timekeeper	Hours	Rate	Total
Elizabeth F. Vieyra	46.80 hrs @ \$	540.00 / hr	25,272.00
Esther Y. Kim	18.20 hrs @ \$	535.00 / hr	9,737.00
Katelin A. Morales	17.20 hrs @ \$	515.00 / hr	8,858.00
Daniel H. Lang	1.00 hrs @ \$	475.00 / hr	475.00
Nora Sooy	4.90 hrs @ \$	380.00 / hr	1,862.00
Scott DeMaris	1.60 hrs @ \$	355.00 / hr	568.00
Shikendra B. Rhea	2.20 hrs @ \$	290.00 / hr	638.00
Total Professional Services			306,460.00

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
	Data Hosting Fee	52.16
	Pacer	NO CHARGE
	User Fee	75.00
03/01/2021	Elizabeth F. Vieyra - Court - Other - VENDOR: Elizabeth F. Vieyra, Mar 01, 2021, SDNY Admission	214.00
03/15/2021	Catherine Lewis - Other -- - VENDOR: Catherine Lewis, Mar 15, 2021, Legal Services - Affidavit witnessed by solicitor Approved by Nicola Beasley	5.82
03/19/2021	FEDEX - [REDACTED] US	44.00
Total Expenses and Other Charges		390.98

INVOICE SUMMARY

Fees	\$	306,460.00
Less 14% Fee Discount	\$	(42,904.40)
Total Fees	\$	263,555.60
Total Expenses and Other Charges	\$	390.98



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Purdue Pharma L.P.
One Stamford Forum
201 Tresser Boulevard
Stamford, CT 06901

Invoice Number: **3394414**
Invoice Date: **5/14/2021**
Client Number: **395187**
Matter Number: **395187.60001**

Client File No.: 20190002679

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH April 30, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
04/02/21	A. Kramer	E-mail exchanges with Ricarte re D&O notices etc	0.40	1,190.00	476.00
04/02/21	A. Kramer	E-mail exchanges with Aleali and DPW re D&O issues with Plan	0.90	1,190.00	1,071.00
04/05/21	A. Kramer	Research/respond to questions re 2019 Isosceles policy from AHC, DPW	0.30	1,190.00	357.00
04/06/21	A. Kramer	Telephone conversation with M. Auslander re claims under NU policy	0.10	1,190.00	119.00
04/08/21	A. Kramer	E-mail exchange with S. Massman re existing D&O coverage	0.20	1,190.00	238.00
04/13/21	A. Kramer	E-mail exchange with D. Kratzer re questions on scope of D&O policies, [REDACTED]	0.50	1,190.00	595.00
04/13/21	A. Kramer	E-mail exchange with R. Aleali re 2019 policy, associated agreements	0.30	1,190.00	357.00
04/13/21	A. Kramer	E-mail exchange with P. Singer and M. Venditto re questions on insurance neutrality	0.20	1,190.00	238.00
04/15/21	A. Kramer	E-mail exchange with C. Garrod re [REDACTED]	0.10	1,190.00	119.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/16/21	A. Kramer	E-mail exchange with Massman et al re D&O insurance questions	0.20	1,190.00	238.00
04/16/21	A. Kramer	Telephone conversation with C. Stokes re [REDACTED]	0.30	1,190.00	357.00
04/16/21	A. Kramer	Conference call with C. Garrod (Conyers) and E. Vonnegut re options re [REDACTED]	0.60	1,190.00	714.00
04/19/21	A. Kramer	email exchange with R. Aleali re D&O coverage questions	0.20	1,190.00	238.00
04/20/21	A. Kramer	Respond to Kratzer-Massman questions re D&O insurance, [REDACTED]	0.40	1,190.00	476.00
04/20/21	A. Kramer	Review/revise [REDACTED]'s notice	0.30	1,190.00	357.00
04/21/21	A. Kramer	Draft summary of telecon with J. DeSilva ([REDACTED]) for Aleali, Massman, Vonnegut and Kratzer	0.20	1,190.00	238.00
04/21/21	A. Kramer	email exchange with Massman, Vonnegut and Kratzer re [REDACTED] proposal	0.30	1,190.00	357.00
04/21/21	A. Kramer	Draft/revise outline of new [REDACTED] proposal for [REDACTED]	1.10	1,190.00	1,309.00
04/21/21	A. Kramer	Telephone conversation with J. DeSilva [REDACTED]	0.10	1,190.00	119.00
04/22/21	A. Kramer	email exchanges re [REDACTED] EPL/FLI [REDACTED] with Ricarte, Vonnegut etc	0.30	1,190.00	357.00
04/22/21	A. Kramer	email exchanges re [REDACTED] proposal issues with DPW and R. Aleali	0.30	1,190.00	357.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/23/21	A. Kramer	email exchanges with E. Vonnegut re proposal outline [REDACTED]	0.20	1,190.00	238.00
04/23/21	A. Kramer	Webex with Ricarte re responses to [REDACTED] [REDACTED] etc	1.00	1,190.00	1,190.00
04/23/21	A. Kramer	Webex with Aleali and Ricarte re responses to [REDACTED] questions re bankruptcy	0.40	1,190.00	476.00
04/23/21	A. Kramer	Webex with Dubel, Vonnegut, Aleali, Huebner et al. re indemnification and insurance issues [REDACTED]	0.50	1,190.00	595.00
04/23/21	A. Kramer	email exchange with C. Ricarte re Rusnak requests	0.10	1,190.00	119.00
04/23/21	A. Kramer	Revise proposal outline for [REDACTED]	0.30	1,190.00	357.00
04/23/21	A. Kramer	Search for materials for Ricarte re D&O notices	0.30	1,190.00	357.00
04/26/21	A. Kramer	Telephone conversation with E. Vonnegut re [REDACTED] etc	0.20	1,190.00	238.00
04/26/21	A. Kramer	Finalize and send response to Rusnak re D&O insurance questions	0.10	1,190.00	119.00
04/26/21	A. Kramer	Telephone conversation with C. Ricarte re [REDACTED] presentation etc	0.70	1,190.00	833.00
04/26/21	A. Kramer	Draft responses to Aleali and Vonnegut re [REDACTED] [REDACTED] strategy	0.60	1,190.00	714.00
04/26/21	A. Kramer	Draft strategy concepts to Aleali and Vonnegut re [REDACTED]	1.20	1,190.00	1,428.00
04/26/21	A. Kramer	Draft responses to Rusnak	0.30	1,190.00	357.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		questions re D&O insurance for [REDACTED] Canada litigation			
04/27/21	A. Kramer	email exchanges with R. Aleali re broker CDA [REDACTED] [REDACTED]	0.10	1,190.00	119.00
04/27/21	A. Kramer	Draft note to Aleali and Vonnegut re telecon with D. Kaloudis [REDACTED]	0.10	1,190.00	119.00
04/27/21	A. Kramer	Telecon with D. Kaloudis [REDACTED]	0.30	1,190.00	357.00
04/28/21	A. Kramer	Telecon with J. DeSilva [REDACTED]	0.10	1,190.00	119.00
04/28/21	A. Kramer	Telecon with D. Kaloudis [REDACTED]	0.10	1,190.00	119.00
04/28/21	A. Kramer	email exchange with Kesselman, Aleali, Vonnegut, Birnbaum et al re proposal [REDACTED] [REDACTED]	0.20	1,190.00	238.00
04/28/21	A. Kramer	Communications with Aleali and Vonnegut re revised proposal [REDACTED]	0.10	1,190.00	119.00
04/28/21	A. Kramer	Communications with Aleali and Vonnegut re [REDACTED] [REDACTED]	0.30	1,190.00	357.00
04/29/21	A. Kramer	Address [REDACTED] [REDACTED] with Kesselman, Aleali, Vonnegut and Massman	0.80	1,190.00	952.00
Totals			15.30		18,207.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	15.30 hrs @ \$	1,190.00 / hr	18,207.00



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Timekeeper	Hours	Rate	Total
Total Professional Services			18,207.00

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
04/07/2021	ADMINISTRATIVE OFFICE OF THE COURTS - GENERAL EXPENSE Monthly subscription fee; March 2021	40.00
	Total Expenses and Other Charges	40.00

INVOICE SUMMARY

Fees	\$ 18,207.00
Less 14% Fee Discount	\$ (2,548.98)
Total Fees	\$ 15,658.02
Total Expenses and Other Charges	\$ 40.00
TOTAL CURRENT INVOICE DUE	\$ 15,698.02
Total Amount Due	\$ 15,698.02



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Purdue Pharma L.P.
One Stamford Forum
201 Tresser Boulevard
Stamford, CT 06901

Invoice Number: **3394397**
Invoice Date: **5/14/2021**
Client Number: **395187**
Matter Number: **395187.60002**

Client File No.: 20190002678

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH April 30, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
04/09/21	A. Kramer	Weekly Canada status call with Stikeman, Robertson and Ricarte.	0.60	1,190.00	714.00
04/13/21	J.N. Ellison	Email communications with RS team re: foreign arbitration issue; review emails and debate re: arbitration clause caselaw	1.30	1,130.00	1,469.00
04/14/21	A. Kramer	Analyze/revise submission for [REDACTED] claim	1.80	1,190.00	2,142.00
04/14/21	A. Kramer	email exchange with C. MacDonald re submission for [REDACTED] claim	0.20	1,190.00	238.00
04/16/21	A. Kramer	E-mail exchange with J. Hudson re [REDACTED] follow up re TIG and CNA	0.20	1,190.00	238.00
04/16/21	A. Kramer	Review/revise spend summary for [REDACTED]	1.80	1,190.00	2,142.00
04/19/21	A. Kramer	Review/respond to Ricarte re [REDACTED] notice to tower	0.30	1,190.00	357.00
04/19/21	A. Kramer	Draft/review/revise opposition submission to [REDACTED] NOD.	1.80	1,190.00	2,142.00
04/20/21	A. Kramer	Review/revise [REDACTED] notice to tower	0.30	1,190.00	357.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/20/21	A. Kramer	Review/revise arbitration brief	1.70	1,190.00	2,023.00
04/23/21	A. Kramer	Canada Status call with Stikeman, DPW and Ricarte	0.50	1,190.00	595.00
04/23/21	A. Kramer	Review [REDACTED] response to letter re NOD	0.20	1,190.00	238.00
04/26/21	A. Kramer	Draft response to requests for backup from [REDACTED] Lowmes aff	1.30	1,190.00	1,547.00
04/26/21	A. Kramer	email exchange with DPW, Dechert and Ricarte and Aleali re Gilbert message	0.30	1,190.00	357.00
04/28/21	A. Kramer	Zoom call with Gilbert, Akin, Dechert reps re settlement strategy	0.40	1,190.00	476.00
Totals			12.70		15,035.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	11.40 hrs @ \$	1,190.00 / hr	13,566.00
John N. Ellison	1.30 hrs @ \$	1,130.00 / hr	1,469.00
Total Professional Services			15,035.00

INVOICE SUMMARY

Fees	\$ 15,035.00
Less 14% Fee Discount	\$ (2,104.90)
Total Fees	\$ 12,930.10
TOTAL CURRENT INVOICE DUE	\$ 12,930.10
Total Amount Due	\$ 12,930.10



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Purdue Pharma L.P.
One Stamford Forum
201 Tresser Boulevard
Stamford, CT 06901

Invoice Number: **3394422**
Invoice Date: **5/14/2021**
Client Number: **395187**
Matter Number: **395187.60004**

Client File No.: 20190002676

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH April 30, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
04/01/21	A. Kramer	email exchange with Kratzer, Massman et al re remaining open insurance issues in Plan\	0.80	1,190.00	952.00
04/03/21	A. Kramer	Respond to DPW insurance questions re Plan	1.30	1,190.00	1,547.00
04/04/21	A. Kramer	Respond to DPW insurance questions re Plan	0.70	1,190.00	833.00
04/06/21	A. Kramer	Communications with C. Ricarte and J. Berringer re payment of [REDACTED] defense costs under surety bonds	0.30	1,190.00	357.00
04/07/21	A. Kramer	E-mail exchanges with Gilbert, DPW and Akin teams re plan provisions [REDACTED]	0.40	1,190.00	476.00
04/09/21	A. Kramer	Telecon with C. Ricarte re Plan issues etc.	0.80	1,190.00	952.00
04/12/21	P.E. Breene	Review DPW e-mails re plan insurance issues.	0.30	1,160.00	348.00
04/12/21	A. Kramer	Research/respond to questions from D. Kratzer re [REDACTED] Policies [REDACTED]	0.60	1,190.00	714.00
04/13/21	M.J. Venditto	Review and analysis of proposal from several insurers for revisions to [REDACTED] the Plan	0.60	1,160.00	696.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/13/21	A. Kramer	Review Insurance Neutrality objection from insurers	0.20	1,190.00	238.00
04/13/21	P.E. Breene	Review DPW e-mails re plan insurance issues and review plan neutrality language from carriers.	0.50	1,160.00	580.00
04/13/21	A. Kramer	E-mail exchange with W. Chang [REDACTED]	0.20	1,190.00	238.00
04/13/21	A. Kramer	email exchange with DPW Team and R. Aleali re Insurance Neutrality objection from insurers	0.30	1,190.00	357.00
04/14/21	M.J. Venditto	Review and analysis of documents relating to insurance issues in plan of reorganization	1.40	1,160.00	1,624.00
04/14/21	M.J. Venditto	Review and comment on revised definitions in draft of first amended plan of reorganization	2.70	1,160.00	3,132.00
04/14/21	A. Kramer	email exchanges with M. Jack [REDACTED]	0.30	1,190.00	357.00
04/14/21	A. Kramer	email exchanges with P. Singer and M. Venditto re insurance neutrality revisions from insurers	0.60	1,190.00	714.00
04/14/21	A. Kramer	Draft/revise [REDACTED] chart	1.10	1,190.00	1,309.00
04/14/21	A. Kramer	Conference call with Massman, Kratzer and Vonnegut re insurance issues with Plan	1.00	1,190.00	1,190.00
04/15/21	M.J. Venditto	Prepare summary of insurance related issues in draft of amended plan	0.50	1,160.00	580.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/15/21	P. M. Singer	Review materials provided by A. Kramer regarding Purdue Plan of Reorganization concerning neutrality.	1.00	1,195.00	1,195.00
04/15/21	P. M. Singer	Call with A. Kramer regarding Purdue POR and neutrality.	0.30	1,195.00	358.50
04/15/21	M.J. Venditto	Review disclosure statement discussion of insurance provisions	1.50	1,160.00	1,740.00
04/15/21	A. Kramer	Review M. Venditto notes re insurance provisions in the Plan	0.30	1,190.00	357.00
04/15/21	M.J. Venditto	Review and comment on revisions to insurance provisions in draft of first amended plan of reorganization	3.00	1,160.00	3,480.00
04/15/21	A. Kramer	Pre-call with Kratzer, Massman and Vonnegut re insurance issues	0.30	1,190.00	357.00
04/15/21	P. M. Singer	All hands call with Davis Polk regarding Purdue Plan of Reorganization and neutrality.	1.00	1,195.00	1,195.00
04/15/21	A. Kramer	email exchange with P. Singer re Insurance neutrality negotiations	0.20	1,190.00	238.00
04/15/21	A. Kramer	Revise [REDACTED] per new info from client	0.30	1,190.00	357.00
04/15/21	A. Kramer	Telephone calls with P. Singer re Insurance neutrality negotiations	0.60	1,190.00	714.00
04/15/21	A. Kramer	Conference call with Ktratzer, Massman, Vonnegut and Singer re Insurance neutrality negotiations	1.00	1,190.00	1,190.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/16/21	M.J. Venditto	Participate in telephone conference call of counsel for Debtors and counsel for Ad Hoc Committee to discuss proposed modifications to provisions of the plan	0.70	1,160.00	812.00
04/16/21	P. M. Singer	Call with A. Kramer regarding next counsel call regarding Plan and neutrality.	0.50	1,195.00	597.50
04/16/21	P. M. Singer	All hands counsel call regarding Plan neutrality language.	1.00	1,195.00	1,195.00
04/16/21	A. Kramer	Conference call with DPW and Gilbert (Gilbert, Quinn, Hudson) re Amended Plan issues, insurance neutrality	0.60	1,190.00	714.00
04/16/21	A. Kramer	Telephone conversations with P. Singer re Amended Plan issues, insurance neutrality	0.50	1,190.00	595.00
04/16/21	A. Kramer	Draft/revise MDT and non-MDT policy charts	2.30	1,190.00	2,737.00
04/16/21	A. Kramer	email exchanges with Massman and DPW team re insurance related provisions in the Plan	0.60	1,190.00	714.00
04/17/21	A. Kramer	Review/analyze draft Amended Plan re insurance issues	4.40	1,190.00	5,236.00
04/18/21	A. Kramer	Conference call with D. Kratzer and S. Massman re RS comments/questions on draft Amended Plan	1.00	1,190.00	1,190.00
04/19/21	M.J. Venditto	Review of correspondence between Marshall Huebner and Jenna Hudson regarding insurance provisions in plan and discussion in disclosure	0.30	1,160.00	348.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		statement			
04/19/21	P. M. Singer	Review various correspondence and portions of draft Plan of Reorganization.	1.50	1,195.00	1,792.50
04/19/21	P. M. Singer	Memo to A. Kramer regarding [REDACTED] language.	0.50	1,195.00	597.50
04/19/21	A. Kramer	email exchanges with Singer, Breene and Venditto re conference call re [REDACTED] issues	0.30	1,190.00	357.00
04/19/21	A. Kramer	Conference call with DPW, Milbank and Gilbert re [REDACTED] issues	0.30	1,190.00	357.00
04/19/21	A. Kramer	Conference call with R. Aleali and DPW re plan issues, [REDACTED]	0.80	1,190.00	952.00
04/19/21	A. Kramer	Catch up call with C. Ricarte re various open insurance issues, D&O notice, [REDACTED] claim etc.	0.80	1,190.00	952.00
04/19/21	A. Kramer	Review/respond to Ricarte re Newco insurance application	0.30	1,190.00	357.00
04/20/21	P. M. Singer	Review new insurance language from Gilbert and Davis Polk.	0.30	1,195.00	358.50
04/20/21	P. M. Singer	Review redline of Plan language.	1.00	1,195.00	1,195.00
04/20/21	M.J. Venditto	Review draft language for amended plan	0.70	1,160.00	812.00
04/21/21	P. M. Singer	Call with A. Kramer regarding disclosure statement process and 327(e)/OCP process.	1.00	1,195.00	1,195.00
04/21/21	A. Kramer	Telephone conversation with P. Singer re insurance	0.40	1,190.00	476.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		neutrality issues			
04/21/21	A. Kramer	Telephone conversation with C. Ricarte re open issues re Plan and oppositions	0.40	1,190.00	476.00
04/21/21	A. Kramer	email exchange with Ricarte and Aleali [REDACTED] issues	0.10	1,190.00	119.00
04/21/21	A. Kramer	email exchanges with Kratzer and Massman re [REDACTED] issues	0.40	1,190.00	476.00
04/22/21	A. Kramer	email exchanges with Kratzer and Massman re revisions to Plan re insurance, insurer injunction	0.60	1,190.00	714.00
04/23/21	M.J. Venditto	Email correspondence with A Kramer and P Singer regarding revisions to insurance neutrality provisions in the plan requested by the Ad Hoc Committee	0.40	1,160.00	464.00
04/23/21	A. Kramer	Review Insurer objection to Disclosure Statement re Insurance Neutrality provision	0.20	1,190.00	238.00
04/26/21	P. M. Singer	Review insurer's proposed disclosure statement language and citations in objection.	1.50	1,195.00	1,792.50
04/26/21	A. Kramer	email exchange with P, Singer re response to DPW re insurance neutrality issues	0.20	1,190.00	238.00
04/27/21	P. M. Singer	Review email exchange regarding disclosure statement language.	0.20	1,195.00	239.00
04/28/21	P. M. Singer	Call with P. Breene, M.	0.60	1,195.00	717.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Venditto and A. Kramer regarding [REDACTED]			
04/28/21	A. Kramer	email exchange with Gilbert and DPW re insurance neutrality, disclosure statement objections	0.10	1,190.00	119.00
04/29/21	P. M. Singer	Review for call with Davis Polk and Gilbert regarding disclosure statement.	0.50	1,195.00	597.50
04/29/21	M.J. Venditto	Review of objection to the Debtors' disclosure statement filed by ad hoc group of nonconsenting states	0.50	1,160.00	580.00
04/29/21	P. M. Singer	Call with A. Kramer, Davis Polk, and Gilbert regarding disclosure statement.	0.30	1,195.00	358.50
04/29/21	A. Kramer	Telephone conversation with P. Singer in preparation for insurance neutrality call	0.20	1,190.00	238.00
04/29/21	A. Kramer	Conference call with Gilbert, DPW, Akin and P. Singer re DS objection re insurance neutrality	0.20	1,190.00	238.00
04/30/21	P. M. Singer	Call with A. Kramer to discuss potential neutrality language.	1.00	1,195.00	1,195.00
04/30/21	A. Kramer	Telephone conversation with P. Singer re DPW message re insurance neutrality disclosure	0.10	1,190.00	119.00
Totals			51.40		60,834.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
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Timekeeper	Hours	Rate	Total
Paul M. Singer	12.20 hrs @ \$	1,195.00 / hr	14,579.00
Ann V. Kramer	26.10 hrs @ \$	1,190.00 / hr	31,059.00
Michael J. Venditto	12.30 hrs @ \$	1,160.00 / hr	14,268.00
Paul E. Breene	0.80 hrs @ \$	1,160.00 / hr	928.00
Total Professional Services			60,834.00

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
	User Fee	150.00
Total Expenses and Other Charges		150.00

INVOICE SUMMARY

Fees	\$ 60,834.00
Less 14% Fee Discount	\$ (8,516.76)
Total Fees	\$ 52,317.24
Total Expenses and Other Charges	\$ 150.00
TOTAL CURRENT INVOICE DUE	\$ 52,467.24
Total Amount Due	\$ 52,467.24



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Purdue Pharma L.P.
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Invoice Number: **3394500**
Invoice Date: **5/14/2021**
Client Number: **395187**
Matter Number: **395187.60005**

Client File No.: 20210003077

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH April 30, 2021

Date	Timekeeper	Description	Hours	Rate	Amount
04/01/21	A. Kramer	E-mail exchanges with Crawford, Morrissey, Hoff re [REDACTED] documents	0.40	1,190.00	476.00
04/01/21	E. F. Vieyra	Draft preliminary argument sections of shell brief in opposition to motion to compel arbitration.	1.70	540.00	918.00
04/01/21	P.E. Breene	Review new draft of Opposition to Withdraw reference motion.	1.80	1,160.00	2,088.00
04/01/21	A. Crawford	Revise factual background and legal sections of opposition to motion to withdraw the reference.	7.40	650.00	4,810.00
04/01/21	E. Y. Kim	Follow up legal research regarding [REDACTED]	1.30	535.00	695.50
04/01/21	M.J. Venditto	Email correspondence with Paul Breene regarding dismissal of claims against [REDACTED]	0.30	1,160.00	348.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		[REDACTED]			
04/01/21	P.E. Breene	Call with Leveridge and counsel for XL Switzerland re substitution.	0.30	1,160.00	348.00
04/01/21	P.E. Breene	Call with Leveridge and Stone to prepare for Court Conference.	0.40	1,160.00	464.00
04/01/21	E. F. Vieyra	Research about [REDACTED]	0.40	540.00	216.00
04/01/21	M.J. Venditto	Review correspondence from Leveridge proposal for three way stipulation [REDACTED] claims against [REDACTED]	0.40	1,160.00	464.00
04/01/21	S. DeMaris	SZYMANSKI-Primary law pull: Search for [REDACTED]	0.30	0.00	NO CHARGE
04/01/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference as per comments of P. Breene, A. Kramer & M. Venditto.	6.50	800.00	5,200.00
04/01/21	A. Kramer	Research/respond to Breene inquiry re approaches to [REDACTED]	0.40	1,190.00	476.00
04/02/21	E. F. Vieyra	Draft facts section of shell brief in opposition to motion to compel arbitration.	2.00	540.00	1,080.00
04/02/21	A. Crawford	Revise factual background and legal sections of opposition to motion to withdraw the reference.	2.40	650.00	1,560.00
04/02/21	C. Lewis	Considering [REDACTED] emails with LSzymanski regarding the same	0.40	555.00	222.00



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04/02/21	E. Y. Kim	Analyze [REDACTED] provisions in policies at issue for adversary complaint for opposition to motion to withdraw the reference.	2.10	535.00	1,123.50
04/02/21	P.E. Breene	Draft and finalize stipulation re Tenecom; Calls and e-mails with committees re same.	0.50	1,160.00	580.00
04/02/21	P.E. Breene	Review Zurich notice letters and e-mails re same with Plevin, Kramer, and Hudson.	0.20	1,160.00	232.00
04/02/21	P.E. Breene	Work on Reference Brief.	2.50	1,160.00	2,900.00
04/02/21	E. F. Vieyra	Interoffice conference with Reed Smith team regarding opposition to motion to compel arbitration.	0.90	540.00	486.00
04/02/21	E. F. Vieyra	Research about [REDACTED] as relevant to motion to compel arbitration.	2.40	540.00	1,296.00
04/02/21	L.A. Szymanski	Phone call w/ L. Vieyra & A. Crawford re: strategy for arbitration brief.	0.90	800.00	720.00
04/02/21	L.A. Szymanski	Review Oppn to anticipated Motion to Compel Arbitration drafted by L. Vieyra.	0.50	800.00	400.00
04/02/21	A. Kramer	Review/analyze [REDACTED] outline from Gilbert	0.50	1,190.00	595.00
04/02/21	A. Kramer	Review/analyze [REDACTED] personal jurisdiction opposition	3.20	1,190.00	3,808.00
04/02/21	A. Kramer	E-mail exchanges with	0.20	1,190.00	238.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Leveridge re personal jurisdiction facts/documents			
04/02/21	M.J. Venditto	Review and revise the revised draft of joint memorandum of law in opposition to Liberty's motion to withdraw the reference	4.00	1,160.00	4,640.00
04/02/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference as per comments of P. Breene, A. Kramer & M. Venditto.	4.70	800.00	3,760.00
04/03/21	P.E. Breene	Review and revise brief and send to team for further comments.	2.80	1,160.00	3,248.00
04/04/21	M.J. Venditto	Review and comment on Paul Breene's revisions to draft of joint memorandum of law in opposition	1.50	1,160.00	1,740.00
04/05/21	A. Crawford	Revise opposition to motion to withdraw the reference.	1.00	650.00	650.00
04/05/21	A. Kramer	email exchange with DPW rehearing hand-off to Adversary	0.20	1,190.00	238.00
04/05/21	A. Crawford	Review and analyze certain Liberty Policies in support of draft motion in opposition to remove the reference.	2.10	650.00	1,365.00
04/05/21	A. Crawford	Prepare for and participate in case organizational call.	1.00	650.00	650.00
04/05/21	P.E. Breene	Review and revise Opposition to Withdrawal of Reference.	1.00	1,160.00	1,160.00
04/05/21	P.E. Breene	Call with team to prep for Scheduling Conference.	0.30	1,160.00	348.00
04/05/21	E. F. Vieyra	Drafting sections of shell brief about [REDACTED]	2.40	540.00	1,296.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		██████████ for opposition to motion to compel arbitration.			
04/05/21	L.A. Szymanski	Participate in conference call w/ RS team in advance of initial conference before Judge Drain.	0.30	800.00	240.00
04/05/21	P.E. Breene	Review Venditto comments to brief and e-mail comments to team.	0.50	1,160.00	580.00
04/05/21	E. F. Vieyra	Drafting sections of shell brief about ██████████ ██████████ opposition to motion to compel arbitration.	1.80	540.00	972.00
04/05/21	A. Kramer	Research/email exchanges with J. Hudson and P. Breene re issues raised by Plevin re Steadfast and American Guarantee	0.40	1,190.00	476.00
04/05/21	E. F. Vieyra	Research about ██████████ ██████████ for opposition to motion to compel arbitration.	2.10	540.00	1,134.00
04/05/21	A. Kramer	Review/revise draft of Opposition to Motion to Withdraw the Reference brief	3.40	1,190.00	4,046.00
04/05/21	A. Kramer	Scan insurer motions to dismiss and joinders	0.40	1,190.00	476.00
04/05/21	P.E. Breene	Review motions filed by insurance companies.	0.90	1,160.00	1,044.00
04/05/21	P.E. Breene	Review draft Opposition to Motion to Stay in Favor of Arbitration.	0.50	1,160.00	580.00
04/05/21	E. Y. Kim	Analyze arbitration provisions and choice of law provisions	1.10	535.00	588.50



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		in policies at issue for adversary complaint for opposition to motion to withdraw the reference.			
04/05/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference as per comments of P. Breene & M. Venditto.	5.40	800.00	4,320.00
04/05/21	M.J. Venditto	Review the Joint Motion to Stay in Favor of Arbitration filed by certain defendants	1.00	1,160.00	1,160.00
04/05/21	S. B. Rhea	Arrange for multiple attorney appearances at upcoming hearing.	0.50	290.00	145.00
04/05/21	S. B. Rhea	Review of docket, identify all briefs filed by insurers, prepare motion tracking chart to assist attorneys in client discussions and further case development.	4.50	290.00	1,305.00
04/05/21	P.E. Breene	Prepare for Scheduling Conference.	2.00	1,160.00	2,320.00
04/05/21	M.J. Venditto	Review and preparation for tomorrow's pre-trial conference with the Bankruptcy Court	1.00	1,160.00	1,160.00
04/05/21	M.J. Venditto	Review and comment on revised draft of memorandum of law in opposition to motion of Liberty Mutual Insurance Company to withdraw the reference of the adversary proceeding from the Bankruptcy Court	2.20	1,160.00	2,552.00
04/05/21	M.J. Venditto	Participate in conference call among counsel for the Plaintiffs to prepare for	0.60	1,160.00	696.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		tomorrow's pre-trial conference with Judge Drain			
04/05/21	M.J. Venditto	Participate in telephone conference call with Paul Breene, Ann Kramer, Anthony Crawford and Lisa Szymanski to discuss agenda for tomorrow's pre-trial conference with the Bankruptcy Court	0.40	1,160.00	464.00
04/05/21	A. Kramer	Communications with P. Breene re preparation for oral argument on 4/6	0.20	1,190.00	238.00
04/06/21	A. Kramer	Communications with Ricarte and Birnbaum re [REDACTED] [REDACTED]	0.40	1,190.00	476.00
04/06/21	A. Kramer	Revise Motion to Withdraw the Reference brief	0.40	1,190.00	476.00
04/06/21	A. Crawford	Attend Court conference call	1.00	650.00	650.00
04/06/21	A. Crawford	Review and analyze briefs filed by defendant insurers.	2.10	650.00	1,365.00
04/06/21	A. Kramer	Conference call with committees to prepare for pre-trial conference	0.30	1,190.00	357.00
04/06/21	A. Kramer	Communications with Breene, Venditto and Szymanski re pre-trial conference, next steps re insurer motions	0.60	1,190.00	714.00
04/06/21	A. Kramer	Telephone conversations with C. Ricarte re pre-trial conference, [REDACTED] [REDACTED]	0.70	1,190.00	833.00
04/06/21	L.A. Szymanski	Attend initial scheduling conference before Judge Drain on Adversary	2.00	800.00	1,600.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Proceeding.			
04/06/21	A. Kramer	Begin review of insurers' arbitration brief	0.40	1,190.00	476.00
04/06/21	A. Kramer	email exchange with R. Leveridge re [REDACTED]	0.10	1,190.00	119.00
04/06/21	A. Kramer	Attend pre-trial conference	2.20	1,190.00	2,618.00
04/06/21	P.E. Breene	Revise latest draft of Motion to Withdraw Reference.	0.30	1,160.00	348.00
04/06/21	P.E. Breene	Team meeting.	0.50	1,160.00	580.00
04/06/21	E. F. Vieyra	Research based on insurers' joint motion to stay in favor of arbitration.	2.60	540.00	1,404.00
04/06/21	E. F. Vieyra	Analyze insurers' joint motion to stay in favor of arbitration.	1.20	540.00	648.00
04/06/21	E. F. Vieyra	Review AIG's motion to withdraw the reference.	0.90	540.00	486.00
04/06/21	L.A. Szymanski	Review Motions filed in advance of conference w/ Judge Drain and create chart categorizing same for use by P. Breene in oral argument at conference.	2.00	800.00	1,600.00
04/06/21	L.A. Szymanski	Read & analyze insurers motions on motion to withdraw the reference, motion to stay pending motion to withdraw the reference, motions for a more definite statement and motions to dismiss for alleged lack of personal jurisdiction.	2.10	800.00	1,680.00
04/06/21	M.J. Venditto	Review and analysis of Motion for Stay of Adversary	2.00	1,160.00	2,320.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Proceeding Pending Resolution of Motion to Withdraw Reference filed by Liberty Mutual Fire Insurance Company			
04/06/21	S. B. Rhea	Identify additional briefs filed by insurers, revise motion tracking chart to assist attorneys in client discussions and further case development.	1.10	290.00	319.00
04/06/21	S. B. Rhea	Identify all briefs filed by insurers relating to Motion to Withdraw Reference.	0.50	290.00	145.00
04/06/21	S. B. Rhea	Identify all briefs filed by insurers relating to Motion To Stay In Favor Of Arbitration.	0.50	290.00	145.00
04/06/21	S. B. Rhea	Identify all briefs filed by insurers relating to Motions for a More Definite Statement.	0.50	290.00	145.00
04/06/21	S. B. Rhea	Identify all briefs filed by insurers relating to Motions to Dismiss for Lack of Personal Jurisdiction.	0.50	290.00	145.00
04/06/21	S. B. Rhea	Identify all Answers to Complaint filed by insurers.	0.50	290.00	145.00
04/06/21	P.E. Breene	Preparation for pre-trial conference.	2.50	1,160.00	2,900.00
04/06/21	M.J. Venditto	Participate in telephonic pre- trial conference call with Judge Drain	2.30	1,160.00	2,668.00
04/06/21	P.E. Breene	Attend and argue at pre-trial conference.	2.50	1,160.00	2,900.00
04/06/21	M.J. Venditto	Participate in telephone conference call with counsel for the Plaintiffs to discuss	0.40	1,160.00	464.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		agenda for this morning's pre-trial conference with Judge Drain			
04/06/21	P.E. Breene	Call with Committee Counsel regarding prep for pre-trial conference.	0.30	1,160.00	348.00
04/06/21	M.J. Venditto	Participate in telephone conference call with P Breene, A Kramer, L Syzmanski and A Crawford to discuss various motions filed by the Defendants last evening	0.50	1,160.00	580.00
04/07/21	A. Crawford	Review and analyze caselaw in support of opposition to motion for arbitration.	0.90	650.00	585.00
04/07/21	M.J. Venditto	Review of letter sent from Paul Koepf on behalf of 11 insurers who filed a motion to be dismissed for lack of personal jurisdiction	0.30	1,160.00	348.00
04/07/21	A. Crawford	Prepare for and participate in call regarding opposition briefs for various motions filed by defendant insurers.	0.70	650.00	455.00
04/07/21	P.E. Breene	Team call to discuss insurance company motions and briefing assignments.	0.60	1,160.00	696.00
04/07/21	P.E. Breene	Planning calls with Gilbert firm.	0.50	1,160.00	580.00
04/07/21	P.E. Breene	Read insurance company briefs.	1.90	1,160.00	2,204.00
04/07/21	A. Kramer	Conference call with RS Team re insurer briefs, oppositions to arbitration and withdraw reference	0.70	1,190.00	833.00



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04/07/21	L.A. Szymanski	Participate in conference call w/ L. Vieyra re: Opposition to Arbitration Brief.	0.50	800.00	400.00
04/07/21	L.A. Szymanski	Participate in RS team call to discuss Insurers' Briefings and Oppositions to same.	0.70	800.00	560.00
04/07/21	M.J. Venditto	Participate in telephone conference call with A Kramer, P Breene, L Szymanski and A Crawford to discuss legal issues raised in motions filed by defendants	0.70	1,160.00	812.00
04/07/21	L.A. Szymanski	Identify [REDACTED] clauses for RS team from a sampling of policies and [REDACTED]	0.70	800.00	560.00
04/07/21	L.A. Szymanski	Provide analysis of research to RS team re: [REDACTED]	1.00	800.00	800.00
04/07/21	L.A. Szymanski	Review and analyze Insurers' Motion to Stay Adversary Proceeding as to Insurers that have arbitration clauses in policies.	0.70	800.00	560.00
04/07/21	E. F. Vieyra	Interoffice conference with L. Szymanski to plan arbitration clause research.	0.50	540.00	270.00
04/07/21	E. F. Vieyra	Analyze [REDACTED] provisions in policies.	0.50	540.00	270.00
04/07/21	E. F. Vieyra	RS team call to review insurers' briefs in pre-answer motions.	0.80	540.00	432.00
04/07/21	M.J. Venditto	Analysis of [REDACTED] provisions in [REDACTED]	0.50	1,160.00	580.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		insurance policies			
04/07/21	M.J. Venditto	Review and analysis in connection with preparation of opposition to Liberty? Mutual's motion to stay the adversary proceeding pending the decision on motion to withdraw the reference	2.00	1,160.00	2,320.00
04/08/21	A. Crawford	Prepare for and participate in regarding personal jurisdiction discovery.	2.40	650.00	1,560.00
04/08/21	L.A. Szymanski	Revise Requests for Production to Insurers on Personal Jurisdiction Issue.	0.40	800.00	320.00
04/08/21	M.J. Venditto	Review and comment on draft of Plaintiffs' request for production of documents by foreign insurance companies	0.60	1,160.00	696.00
04/08/21	P.E. Breene	Review and revise jurisdictional requests for production of documents.	0.50	1,160.00	580.00
04/08/21	P.E. Breene	Review brief re motion to withdraw reference.	0.50	1,160.00	580.00
04/08/21	P.E. Breene	Call with committees re discovery Meet and confer.	0.50	1,160.00	580.00
04/08/21	P.E. Breene	Further review of arbitration motion.	1.00	1,160.00	1,160.00
04/08/21	E. F. Vieyra	Research about [REDACTED] for opposition to motion to compel arbitration.	1.90	540.00	1,026.00
04/08/21	E. F. Vieyra	Research about [REDACTED] based on ResCap case.	1.10	540.00	594.00
04/08/21	L.A. Szymanski	Research re: Opposition for	1.60	800.00	1,280.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Motion to Stay Adversary Proceeding as to Insurers' w/ Arbitration Clauses in Policies.			
04/08/21	M.J. Venditto	Review of proofs of claims filed by insurers	1.80	1,160.00	2,088.00
04/08/21	N. Sooy	Analyze Answers filed in Adversary Proceeding to determine Affirmative Defenses that include [REDACTED]	0.50	380.00	190.00
04/08/21	M.J. Venditto	Legal research regarding [REDACTED]	1.20	1,160.00	1,392.00
04/08/21	S. DeMaris	SZYMANSKI-Docket research [REDACTED]	0.30	355.00	106.50
04/08/21	N. Sooy	Draft a chart of policy language in policies at issue in Adversary Proceeding that include language re [REDACTED]	1.10	380.00	418.00
04/08/21	L.A. Szymanski	Attention to [REDACTED] for purposes of revising Oppn to Motion to Withdraw Reference.	0.20	800.00	160.00
04/08/21	M.J. Venditto	Review and comment on Leveridge draft response to proposal from insurers who are contesting personal jurisdiction	0.90	1,160.00	1,044.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/09/21	A. Crawford	Revise opposition to motion to withdraw the reference.	1.20	650.00	780.00
04/09/21	A. Kramer	email exchanges with R. Hoff and R. Leveridge re documents supporting opposition to Personal Jurisdiction motion	0.30	1,190.00	357.00
04/09/21	A. Kramer	Revise brief in opposition to MTWR motion	0.80	1,190.00	952.00
04/09/21	A. Crawford	Prepare and participate in call regarding jurisdictional discovery.	1.00	650.00	650.00
04/09/21	S. B. Rhea	Prepare spreadsheet to identify [REDACTED]	3.20	290.00	928.00
04/09/21	N. Sooy	Draft memo re minutes from meet and confer meeting to discuss Purdue's Requests for Production of Documents.	0.40	380.00	152.00
04/09/21	N. Sooy	Attend t/c with attorneys for insurance companies re meet and confer to discuss Purdue's Requests for Production of Documents.	0.70	380.00	266.00
04/09/21	P.E. Breene	Meet and confer call with personal jurisdiction insurance companies.	1.00	1,160.00	1,160.00
04/09/21	P.E. Breene	Follow up call with committees re Meet and confer.	0.40	1,160.00	464.00
04/09/21	E. F. Vieyra	Review table of motions by insurer defendants prepared by S. Rhea.	0.20	540.00	108.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/09/21	L.A. Szymanski	Research in preparation for drafting Opposition to Motion to Stay Adversary Proceeding as to Insurers w/ Arbitration Clauses.	1.70	800.00	1,360.00
04/09/21	M.J. Venditto	Review individual practice rules for Judge Bricetti	0.20	1,160.00	232.00
					232.00
04/09/21	M.J. Venditto	Review transcript of April 6 pre-trial conference	0.90	1,160.00	1,044.00
04/09/21	L.A. Szymanski	Review transcript from initial scheduling conference w/ judge and revise brief	1.70	800.00	1,360.00
04/09/21	N. Sooy	Revisions to chart of policy language in policies at issue in Adversary Proceeding that include	1.80	380.00	684.00
04/09/21	E. F. Vieyra	Review transcript from 4/6 proceeding before Judge Drain.	0.40	540.00	216.00
04/09/21	E. F. Vieyra	Draft synopsis of case.	0.80	540.00	432.00
04/09/21	E. F. Vieyra	Research to identify cases	2.90	540.00	1,566.00
04/09/21	M.J. Venditto	Review and comment on Plaintiffs' draft request to foreign insurers regarding jurisdictional discovery	0.90	1,160.00	1,044.00
04/09/21	L.A. Szymanski	Attention to new district court judge assigned to Motion to	0.20	800.00	160.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Withdraw the Reference.			
04/09/21	M.J. Venditto	Prepare draft outline for today's meet and confer [REDACTED]	0.60	1,160.00	696.00
04/11/21	E. F. Vieyra	Draft chart analyzing [REDACTED]	0.80	540.00	432.00
04/11/21	A. Crawford	Review and analyze [REDACTED] [REDACTED] in support of opposition to Arbitration Motions.	0.90	650.00	585.00
04/12/21	A. Crawford	Prepare for and participate in call regarding discover in support of opposition to motions filed by defendant insurers.	2.60	650.00	1,690.00
04/12/21	A. Kramer	email exchanges with R. Hoff and C. Ricarte re production of [REDACTED]	0.10	1,190.00	119.00
04/12/21	M.J. Venditto	Review of insurance policy provisions relating to defendants' motion to stay adversary proceeding under Federal Arbitration Act.	1.30	1,160.00	1,508.00
04/12/21	M.J. Venditto	Review of legal research on [REDACTED] issues	1.50	1,160.00	1,740.00
04/12/21	E. F. Vieyra	RS Team call to dispute progress on drafting of opposition to arbitration motion.	0.90	540.00	486.00
04/12/21	L.A. Szymanski	Email communications w/ RS team re: [REDACTED] [REDACTED]	0.50	800.00	400.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/12/21	P.E. Breene	Revise Opposition to Motion To Withdraw Reference; Review arbitration brief.	1.50	1,160.00	1,740.00
04/12/21	E. F. Vieyra	Research about [REDACTED] for opposition to motion to compel arbitration.	1.30	540.00	702.00
04/12/21	M.J. Venditto	Review and comment on revisions to Opposition to the Motion to Withdraw the Reference	1.90	1,160.00	2,204.00
04/12/21	L.A. Szymanski	Revisions to Obj. to Motion to Withdraw Reference to fit within 25 page limitation.	3.00	800.00	2,400.00
04/12/21	M.J. Venditto	Review and respond to email received from R Leveridge regarding defendants' motions to dismiss or stay the adversary proceeding	0.30	1,160.00	348.00
04/12/21	N. Sooy	Analyze policies at issue in Adversary Proceeding to prepare chart of [REDACTED] for review by attorney L. Szymanski.	1.20	380.00	456.00
04/12/21	S. DeMaris	SZYMANSKI-Primary law research: Search for [REDACTED]	0.30	355.00	106.50
04/12/21	L.A. Szymanski	Participate in conference call w/ A. Crawford & L. Vieyra re: arbitration brief and discovery	0.50	800.00	400.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		needed from arbitration insurers.			
04/12/21	E. Y. Kim	Draft spreadsheet regarding [REDACTED] provisions in Purdue policies for opposition to motion to stay arbitration brief.	3.40	535.00	1,819.00
04/13/21	A. Crawford	Revise legal arguments and discovery requests related to opposition of arbitration briefs	3.50	650.00	2,275.00
04/13/21	N. Sooy	Revision to caselaw and record citations in draft Objection to Motion to Withdraw the Reference.	0.90	380.00	342.00
04/13/21	L.A. Szymanski	Draft written discovery requests [REDACTED] in preparation for meet and confer with arbitration insurers.	2.00	800.00	1,600.00
04/13/21	M.J. Venditto	Participate in conference call with R. Leveridge, R. Shore, J. Rubinstein and P. Breene to prepare for meet and confer with defense counsel	0.60	1,160.00	696.00
04/13/21	M.J. Venditto	Review and comment on draft of request for production of documents	0.50	1,160.00	580.00
04/13/21	M.J. Venditto	Review and preparation for meet and confer with defense counsel	0.50	1,160.00	580.00
04/13/21	E. F. Vieyra	Review and revise draft	0.70	540.00	378.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		request for production to arbitration insurers.			
04/13/21	E. F. Vieyra	Draft opposition to motion to compel arbitration sections: introduction, factual background, scope of abitation clauses.	5.10	540.00	2,754.00
04/13/21	P.E. Breene	Review and revise personal jurisdiction discovery requests.	0.20	1,160.00	232.00
04/13/21	P.E. Breene	Revise Opposition to Motion To Withdraw Reference.	1.00	1,160.00	1,160.00
04/13/21	P.E. Breene	Call with Gilbert team re personal jurisdiction discovery issues.	0.30	1,160.00	348.00
04/13/21	M.J. Venditto	Confer with R Leveridge, counsel for the Ad Hoc Committee, regarding hearing on motions to dismiss	0.40	1,160.00	464.00
04/13/21	L.A. Szymanski	Revise Obj. to Motion to Withdraw Reference.	3.00	800.00	2,400.00
04/13/21	S. DeMaris	SZYMANSKI-Docket research: [REDACTED]	0.40	355.00	142.00
04/13/21	N. Sooy	Draft list of [REDACTED] Insurance Policies.	2.70	380.00	1,026.00
04/13/21	L.A. Szymanski	Email communications w/ RS team re: strategy for Opposition to Arbitration Insurers' Motion to Stay.	0.50	800.00	400.00
04/13/21	E. Y. Kim	Revise opposition to motion to withdraw the reference brief per L. Szymanski's request to proofread.	1.60	535.00	856.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/13/21	E. Y. Kim	Revise spreadsheet of [REDACTED] provisions in policies at issue for opposition to motion to stay arbitration brief.	0.60	535.00	321.00
04/14/21	A. Crawford	Review and analyze correspondence from certain insurers in preparation for meet and confer.	1.00	650.00	650.00
04/14/21	A. Crawford	Revise arbitration requests for production.	2.60	650.00	1,690.00
04/14/21	A. Crawford	Prepare for and participate in meet and confer regarding personal jurisdiction discover and draft analysis of the same.	3.60	650.00	2,340.00
04/14/21	L.A. Szymanski	Revise as per comments of L. Vieyra & A. Crawford and comments of P. Breene & M. Venditto written discovery requests [REDACTED] for meet and confer with arbitration insurers.	1.50	800.00	1,200.00
04/14/21	M.J. Venditto	Participate in "meet and confer" conference call with counsel for defendants asserting lack of personal jurisdiction defense to discuss jurisdictional discovery requests	0.90	1,160.00	1,044.00
04/14/21	M.J. Venditto	Review and revise draft of document requests to	0.40	1,160.00	464.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		defendants moving to compel arbitration			
04/14/21	M.J. Venditto	Review and preparation for "meet and confer" with counsel for defendants to discuss jurisdictional discovery	0.60	1,160.00	696.00
04/14/21	E. F. Vieyra	Review and revise draft opposition to motion to compel arbitration.	2.90	540.00	1,566.00
04/14/21	E. F. Vieyra	Research to distinguish cases cited in insurers' arbitration brief.	1.40	540.00	756.00
04/14/21	L.A. Szymanski	Research for Oppn to Arbitration Insurers' Motion to Stay.	5.50	800.00	4,400.00
04/14/21	N. Sooy	Revise chart of [REDACTED] policies at issue in Adversary Proceeding for review by attorney L. Szymanski.	1.80	380.00	684.00
04/14/21	P.E. Breene	Various calls and respond to e-mails within firm re briefing of arbitration motion.	0.50	1,160.00	580.00
04/14/21	E. Y. Kim	Legal research regarding [REDACTED] for opposition to motion to stay in favor of arbitration brief.	2.80	535.00	1,498.00
04/14/21	A. Kramer	Conference call with Leveridge and Rush re facts for opposition to personal jurisdiction motion	1.00	1,190.00	1,190.00
04/15/21	E. F. Vieyra	Documents review of insurer communications for	3.70	540.00	1,998.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		privilege/relevance in relation to motion to dismiss for lack of personal jurisdiction.			
04/15/21	P.E. Breene	Review DPW and Client comments on Reference briefing.	1.00	1,160.00	1,160.00
04/15/21	A. Kramer	Conference call with Leveridge and Rush re personal jurisdiction factual background	1.00	1,190.00	1,190.00
04/15/21	A. Crawford	Prepare for and participate in meet and confer.	1.00	650.00	650.00
04/15/21	R.P. Lewis	Emails on discovery [REDACTED]	0.20	1,100.00	220.00
04/15/21	R.P. Lewis	Call on discovery.	0.70	1,100.00	770.00
04/15/21	A. Crawford	Prepare for and participate in case status calls.	1.00	650.00	650.00
04/15/21	A. Crawford	Revise legal section of opposition to arbitration motion.	5.40	650.00	3,510.00
04/15/21	P.E. Breene	DRaft response to Koepff letter re arbitration discovery issues; Circulate same to committees for comment.	0.60	1,160.00	696.00
04/15/21	P.E. Breene	Meet and confer call with Arbitration insurance companies re discovery issues.	0.70	1,160.00	812.00
04/15/21	P.E. Breene	Calls with Leveridge re meet and confer and other discovery issues.	0.50	1,160.00	580.00
04/15/21	P.E. Breene	Call with Rob Hoff et al re responses to Liberty letter re Meet and Confer.	0.70	1,160.00	812.00
04/15/21	L.A. Szymanski	Participate in conference call	0.70	800.00	560.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		w/ Robert Hoff, P. Breene & A. Crawford re: [REDACTED] [REDACTED] in response to Insurers' letter requesting categories of documents.			
04/15/21	L.A. Szymanski	Participate in meet and confer call w/ arbitration insurers.	0.70	800.00	560.00
04/15/21	E. F. Vieyra	RS Team call to discuss progress on drafting of opposition to arbitration motion.	0.60	540.00	324.00
04/15/21	P.E. Breene	Research re [REDACTED] [REDACTED]	0.50	1,160.00	580.00
04/15/21	L.A. Szymanski	Research for potential use in Opposition to Arbitration Insurers' Motion to Stay [REDACTED] [REDACTED]	1.00	800.00	800.00
04/15/21	L.A. Szymanski	Draft section of Opposition to Arbitration Insurers' Motion to Stay based on [REDACTED] [REDACTED]	4.70	800.00	3,760.00
04/15/21	M.J. Venditto	Review comments from Christina Ricarte on draft memorandum of law in opposition to motion to withdraw the reference	0.50	1,160.00	580.00
04/15/21	M.J. Venditto	Review and comment on draft response to meet and confer proposal from the arbitration asserting insurance	0.40	1,160.00	464.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		companies			
04/15/21	L.A. Szymanski	Participate in conference call w/ L. Vieyra & A. Crawford re: Opposition to Arbitration Insurers' Motion to Stay.	0.60	800.00	480.00
04/15/21	N. Sooy	Research caselaw re [REDACTED]	0.40	380.00	152.00
04/16/21	E. F. Vieyra	Documents review of insurer communications for privilege/relevance in relation to motion to dismiss for lack of personal jurisdiction.	1.80	540.00	972.00
04/16/21	A. Kramer	email exchange with A. Gaske re facts supporting opposition to personal jurisdiction motion	0.30	1,190.00	357.00
04/16/21	A. Crawford	Revise draft opposition to arbitration brief.	4.40	650.00	2,860.00
04/16/21	A. Crawford	Prepare for and participate in meet and confer.	2.20	650.00	1,430.00
04/16/21	R.P. Lewis	Review of [REDACTED] for Paul Breene.	0.60	1,100.00	660.00
04/16/21	A. Kramer	Conference call with RS Team re opposition to Motion to Withdraw the Reference brief	0.40	1,190.00	476.00
04/16/21	A. Crawford	Prepare for and participate in internal strategy calls.	2.10	650.00	1,365.00
04/16/21	L.A. Szymanski	Attention to need for Stipulation to Substitute XL Switzerland for Tenecom in Complaint as successor to Winterthur policy.	0.30	800.00	240.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/16/21	P.E. Breene	Review Gilbert changes to response to Marrkand letter.	0.20	1,160.00	232.00
04/16/21	P.E. Breene	Draft letter to answering insurance companies re results of meet and confer.	0.50	1,160.00	580.00
04/16/21	M.J. Venditto	Review comments and proposed revisions to memorandum of law in opposition to Liberty Mutual's motion to withdraw the reference	0.80	1,160.00	928.00
04/16/21	M.J. Venditto	Review revised draft of the proposed letter agreement with respect to jurisdictional discovery of the defendant insurers	0.40	1,160.00	464.00
04/16/21	L.A. Szymanski	Participate in conference call w/ Plaintiffs & Insurers re: discovery needed for Personal Jurisdiction briefings.	0.80	800.00	640.00
04/16/21	M.J. Venditto	Research and review [REDACTED] in connection with opposition to motion of certain insurers to stay adversary proceeding in favor of arbitration	1.30	1,160.00	1,508.00
04/16/21	P.E. Breene	Read and review [REDACTED] cases.	2.50	1,160.00	2,900.00
04/16/21	M.J. Venditto	Email to M Auslander and K Marrkand regarding defendant's motions pending before Judge Drain AIG motion to withdraw the reference	0.40	1,160.00	464.00
04/16/21	L.A. Szymanski	Revise Opposition to Arbitration Insurers' Motion to	5.90	800.00	4,720.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Stay.			
04/16/21	M.J. Venditto	Review and revise draft of opposition to motion of certain insurers to stay adversary proceeding in favor of arbitration	1.50	1,160.00	1,740.00
04/16/21	M.J. Venditto	Coordinate among plaintiffs counsel for hearing on motions to dismiss adversary proceeding	0.40	1,160.00	464.00
04/16/21	M.J. Venditto	Review and respond to email received from R Leveridge regarding AIG motion to withdraw the reference	0.30	1,160.00	348.00
04/16/21	L.A. Szymanski	Review comments [REDACTED] Obj. to Motion to Withdraw Reference.	0.50	800.00	400.00
04/16/21	L.A. Szymanski	Phone call w/ paralegal N. Sooy re: creating affirmation of Paul Breene to accompany Obj. to Motion to Withdraw Reference.	0.50	800.00	400.00
04/16/21	L.A. Szymanski	Participate in conference call w/ P. Breene & A. Crawford to discuss [REDACTED] edits to Objection to Motion to Withdraw Reference.	0.70	800.00	560.00
04/16/21	M.J. Venditto	Participate in telephone conference call with P Breene, A Crawford and L Szymanski to discuss comments on dragt memorandum of law in opposition to Liberty Mutual's motion to withdraw the reference	0.30	1,160.00	348.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/16/21	P.E. Breene	Meet and confer with answering defendants.	0.80	1,160.00	928.00
04/16/21	E. Y. Kim	Draft master briefing chart for opposition to motion to stay in favor of arbitration and opposition to motion to withdraw reference briefs per L. Szymanski's request [REDACTED]	1.50	535.00	802.50
04/16/21	N. Sooy	Draft Stipulation to substitute defendants.	0.80	380.00	304.00
04/16/21	N. Sooy	Draft Declaration of attorney P. Breene in support of opposition brief to insurers' objections.	0.80	380.00	304.00
04/17/21	E. F. Vieyra	Document review of insurer communications for privilege/relevance in relation to motion to dismiss for lack of personal jurisdiction.	2.60	540.00	1,404.00
04/17/21	E. F. Vieyra	Draft stipulation to substitute parties.	0.50	540.00	270.00
04/17/21	E. Y. Kim	Analyze cases from defendant insurance companies' motion to stay in arbitration brief per L. Szymanski's request.	0.90	535.00	481.50
04/17/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference per edits of [REDACTED]	7.50	800.00	6,000.00
04/17/21	L.A. Szymanski	Review/analyze edits by P. Breene to Opposition to Stay as to Arbitration Insurers.	0.40	800.00	320.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/18/21	A. Crawford	Revise opposition to Arbitration motion.	0.60	650.00	390.00
04/18/21	E. F. Vieyra	Review comments from P. Breene to draft opposition to arbitration motion.	0.40	540.00	216.00
04/18/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference per edits of [REDACTED]	4.80	800.00	3,840.00
04/18/21	P.E. Breene	Review draft brief in opposition to motion to stay or dismiss in favor of arbitration; SEND comments and revised brief to team.	2.00	1,160.00	2,320.00
04/18/21	E. Y. Kim	Draft, revise master briefing chart of all policies for opposition to motion to stay in favor of arbitration and opposition to motion to withdraw reference briefs of relevant policy provisions [REDACTED]	3.80	535.00	2,033.00
04/19/21	N. Sooy	Draft Declaration of Paul Breene in support of Plaintiffs' Objection to Liberty's Motion to Withdraw the Reference.	1.30	380.00	494.00
04/19/21	A. Kramer	Review/revise opposition to motion to withdraw the reference.	0.40	1,190.00	476.00
04/19/21	A. Crawford	Review documents to be provided to committees in support of their personal jurisdiction motions for privilege.	1.00	650.00	650.00
04/19/21	A. Crawford	Revise opposition to arbitration motion.	5.80	650.00	3,770.00
04/19/21	R.P. Lewis	Research in [REDACTED]	2.10	1,100.00	2,310.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		[REDACTED] and sending selections to team.			
04/19/21	P.E. Breene	Revise letter to answering insurance companies re results of meet and confer; E- mail exchanges re same with Hoff; E-mails re PJ discovery issues.	0.30	1,160.00	348.00
04/19/21	L.A. Szymanski	Review & revise Stipulation Substituting XL Switzerland for Tenecom in Complaint drafted by L. Vieyra.	0.50	800.00	400.00
04/19/21	A. Kramer	email exchanges re scheduling oppositions to insurer motions	0.30	1,190.00	357.00
04/19/21	A. Kramer	email exchanges with Crawford, Breene et al. re documents supporting oppositions, [REDACTED] [REDACTED]	0.30	1,190.00	357.00
04/19/21	L.A. Szymanski	Participate in conference call w/ M. Venditto & P. Breene re: Objection to Motion to Withdraw Reference & issue of [REDACTED]	0.30	800.00	240.00
04/19/21	M.J. Venditto	telephone conversation with Genevieve DiSpirito, counsel for certain defendants, regarding 11 motions to dismiss or stay adversary proceeding	0.30	1,160.00	348.00
04/19/21	M.J. Venditto	Participate in telephone conference call with Dorothy Li, Judge Drain's courtroom deputy, and Genevieve DiSpirito, counsel for certain defendants, regarding	0.20	1,160.00	232.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		calendar for hearing 11 motions to dismiss or stay adversary proceeding			
04/19/21	M.J. Venditto	Email correspondence to and from R. Leveridge regarding calendar for hearing 11 motions to dismiss or stay	0.30	1,160.00	348.00
04/19/21	M.J. Venditto	Email correspondence to and from R. Leveridge regarding calendar for hearing 11 motions to dismiss or stay	0.30	1,160.00	348.00
04/19/21	M.J. Venditto	Review memo from Lisa Szymanski regarding strategy regarding Liberty Mutual's motion to withdraw the reference	0.40	1,160.00	464.00
04/19/21	P.E. Breene	Review TIG Motion to lift stay or dismiss in favor of arbitration(.7); Call with Kramer and DPW team re same(.3).	1.00	1,160.00	1,160.00
04/19/21	M.J. Venditto	Review comments from Kathryn Benedict on draft of Plaintiffs' opposition to motion to withdraw the reference	0.30	1,160.00	348.00
04/19/21	S. DeMaris	SZYMANSKI-Primary Law Research: [REDACTED]	0.30	355.00	106.50
04/19/21	M.J. Venditto	Email correspondence to and from Paul Breene regarding calendar for hearing 11 motions to dismiss or stay	0.20	1,160.00	232.00
04/19/21	E. Y. Kim	Revise master briefing chart of policies for [REDACTED] [REDACTED] for opposition brief to motion to	1.60	535.00	856.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		stay in favor of arbitration.			
04/19/21	E. F. Vieyra	Revision in response to comments from P. Breene to draft opposition to arbitration motion.	2.60	540.00	1,404.00
04/19/21	A. Kramer	Conference call with K. Benedict, M. Tobak and Breene re TIG Lift Stay motion	0.30	1,190.00	357.00
04/19/21	L.A. Szymanski	Revise Objection to Liberty's Motion to Withdraw Reference as per comments of P. Breene, M. Venditto & A. Kramer.	7.90	800.00	6,320.00
04/19/21	M.J. Venditto	Review comments from Paul Breene and Ann Kramer on draft of memorandum of law in opposition to Liberty Mutual's motion to withdraw the reference	0.50	1,160.00	580.00
04/19/21	M.J. Venditto	Revise draft memorandum of law in opposition to Liberty Mutual's motion to withdraw the reference	3.00	1,160.00	3,480.00
04/19/21	M.J. Venditto	Review comments from Ann Kramer on revise memorandum of law in opposition to motion to withdraw the reference	0.30	1,160.00	348.00
04/19/21	P.E. Breene	Review and revise draft brief in opposition to motion to withdraw reference; Calls with team re same; Review Stern case and articles re same.	5.50	1,160.00	6,380.00
04/20/21	A. Crawford	Revise opposition to arbitration motion.	6.40	650.00	4,160.00
04/20/21	R.P. Lewis	Review of and note on [REDACTED]	0.20	1,100.00	220.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		memo.			
04/20/21	M.J. Venditto	Review Bankruptcy Court's procedure order of Nov. 19, 2019	0.60	1,160.00	696.00
04/20/21	E. F. Vieyra	Review comments of A. Kramer to brief in opposition to arbitration motion.	0.40	540.00	216.00
04/20/21	P.E. Breene	Call with George Calhoun re Lift Stay Motion.	0.20	1,160.00	232.00
04/20/21	P.E. Breene	Call with Rob Hoff and Crawford re PJ and [REDACTED] discovery issues.	0.40	1,160.00	464.00
04/20/21	E. Y. Kim	Analyze consent to settle provisions of policies at issue for opposition brief to motion to stay in favor of arbitration per L. Szymanski's request.	0.90	535.00	481.50
04/20/21	S. B. Rhea	Prepare initial draft of Objection to Motion to Withdraw Reference as to Certain Arbitration Insurers; forward same to attorney.	0.30	290.00	87.00
04/20/21	S. B. Rhea	Prepare initial draft of Objection to Motion to Withdraw Reference as to AGLIC and Steadfast; forward same to attorney.	0.30	290.00	87.00
04/20/21	S. B. Rhea	Prepare initial draft of Objection to Motion to Withdraw Reference as to Moveants; forward same to attorney.	0.30	290.00	87.00
04/20/21	S. B. Rhea	Prepare initial draft of Objection to Motion to Withdraw Reference as to SR International, Chubb European Group, et al;	0.30	290.00	87.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		forward same to attorney.			
04/20/21	S. B. Rhea	Prepare initial draft of Objection to Motion to Withdraw Reference as to Liberty Mutual, et al; forward same to attorney.	0.30	290.00	87.00
04/20/21	M.J. Venditto	Review of Second Circuit caselaw [REDACTED]	1.00	1,160.00	1,160.00
04/20/21	N. Sooy	Revise draft Declaration of Paul Breene in support of Objection to Liberty's Motion to Withdraw the Reference.	2.30	380.00	874.00
04/20/21	P.E. Breene	Review Committee correspondence re discovery issues and TIG Motion to lift stay or dismiss in favor of arbitration and respond to same.	0.50	1,160.00	580.00
04/20/21	E. F. Vieyra	Revise brief opposing arbitration to include discussion of [REDACTED]	1.70	540.00	918.00
04/20/21	A. Kramer	email exchange with Crawford, Breene & Hoff re privilege redactions [REDACTED] for personal jurisdiction opposition	0.30	1,190.00	357.00
04/20/21	L.A. Szymanski	Revise Objection to Liberty's Motion to Withdraw the Reference.	0.60	800.00	480.00
04/20/21	L.A. Szymanski	Draft Opposition to Arbitration Insurers' Motion to Stay and revise same per comments of A. Kramer.	9.00	800.00	7,200.00
04/20/21	P.E. Breene	Review and revise draft brief	1.90	1,160.00	2,204.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		in opposition to motion for stay.			
04/20/21	M.J. Venditto	Review and comment on draft of Plaintiffs' Opposition to the Motion to Stay in Favor of Arbitration	3.00	1,160.00	3,480.00
04/20/21	M.J. Venditto	Review and respond to emails from A Kramer regarding [REDACTED]	0.30	1,160.00	348.00
04/20/21	M.J. Venditto	Review court's OCP procedures order	0.80	1,160.00	928.00
04/20/21	M.J. Venditto	Review documents regarding [REDACTED]	1.00	1,160.00	1,160.00
04/21/21	N. Sooy	Draft Opposition to Motion for Stay of Adversary Proceeding Pending Resolution of Motion to Withdraw Reference.	0.60	380.00	228.00
04/21/21	N. Sooy	Draft Opposition/Objection to Certain Defendants' Joinder in Motion to Withdraw the Reference by Chubb, et al.	0.60	380.00	228.00
04/21/21	N. Sooy	Draft Opposition/Objection to Joinder of American Guarantee and Steadfast in Liberty's Motion to Withdraw the Reference.	0.60	380.00	228.00
04/21/21	N. Sooy	Draft Opposition/Objection to Joint Memorandum of Certain Arbitration Insurers in support of their Motion to Withdraw the Reference of this Adversary Proceeding	0.60	380.00	228.00
04/21/21	E. Y. Kim	Analyze policies regarding [REDACTED] for opposition briefs to motion	4.80	535.00	2,568.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		to withdraw the reference and motion to stay in favor of arbitration.			
04/21/21	E. F. Vieyra	Review comments of P. Breene and A. Kramer to draft opposition motion.	0.90	540.00	486.00
04/21/21	A. Crawford	Prepare and participate in document review protocol meeting regarding [REDACTED]	0.80	650.00	520.00
04/21/21	A. Crawford	Revise opposition to arbitration motion.	3.30	650.00	2,145.00
04/21/21	A. Kramer	Work on opposition to arbitration brief, analysis of [REDACTED]	0.80	1,190.00	952.00
04/21/21	E. F. Vieyra	Analyze Arch joint motion re: withdrawal of reference.	0.60	540.00	324.00
04/21/21	P.E. Breene	Work on PJ insurance companies document productions; Communications re same with Leveridge.	0.80	1,160.00	928.00
04/21/21	A. Kramer	email exchange with Vieyra and Breene re [REDACTED] analysis	0.30	1,190.00	357.00
04/21/21	A. Kramer	email exchange with Venditto re Plan injunction issue for use in opposition briefs	0.20	1,190.00	238.00
04/21/21	L.A. Szymanski	Conference call w/ A. Crawford & L. Vieyra re: revisions to Opposition to Arbitration Insurers' Motion to Stay.	0.70	800.00	560.00
04/21/21	M.J. Venditto	Revise draft of memorandum of law in opposition to	5.40	1,160.00	6,264.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		defendants' motion to compel arbitration of adversary proceeding			
04/21/21	M.J. Venditto	Email correspondence with Mitch Auslander and Genevieve DiSpirito regarding defendants' motions	0.40	1,160.00	464.00
04/21/21	L.A. Szymanski	Attention to chart of policies [REDACTED] prepared by E. Kim.	0.60	800.00	480.00
04/21/21	L.A. Szymanski	Attention to language of policies w/ [REDACTED] clauses addressed in Opposition to Arbitration Insurers' Motion to Stay.	0.60	800.00	480.00
04/21/21	E. F. Vieyra	Draft revised facts section concerning policy language for arbitration opposition motion.	1.10	540.00	594.00
04/21/21	E. F. Vieyra	Revise scope of arbitration section based on comments of A. Kramer and P. Breene.	1.00	540.00	540.00
04/21/21	E. F. Vieyra	RS team call to discuss addressing comments of P. Breene and A. Kramer to arbitration opposition brief.	0.80	540.00	432.00
04/21/21	E. Y. Kim	Research [REDACTED] at issue for opposition brief to motion to stay in favor of arbitration per L. Szymanski's request.	0.90	535.00	481.50
04/21/21	M.J. Venditto	Revise draft of language analyzing plan injunction provisions	0.60	1,160.00	696.00
04/21/21	P.E. Breene	Review and revise draft brief in opposition to motion for	2.80	1,160.00	3,248.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		stay motion and various e-mails and calls with team re same.			
04/21/21	L.A. Szymanski	Revise Opposition to Motion to Stay in favor of Arbitration as per edits of A. Kramer, M. Venditto, P. Breene & K. Benedict.	6.30	800.00	5,040.00
04/22/21	N. Sooy	Revise caselaw citations in draft Opposition to Motion to Stay in Favor of Arbitration.	0.60	380.00	228.00
04/22/21	A. Kramer	Review/revise draft of arbitration brief	2.60	1,190.00	3,094.00
04/22/21	E. Y. Kim	Analyze policies regarding [REDACTED] for opposition brief to insurance companies' motion to stay in favor of arbitration.	1.90	535.00	1,016.50
04/22/21	A. Crawford	Prepare for and participate in meet and confer call s and case status calls.	1.70	650.00	1,105.00
04/22/21	E. F. Vieyra	Analyze [REDACTED].	0.90	540.00	486.00
04/22/21	E. F. Vieyra	Review additional comments of P. Breene and A. Kramer to opposition to arbitration motion.	0.70	540.00	378.00
04/22/21	A. Kramer	email exchange with Ricarte, Hoff et al re [REDACTED] question	0.20	1,190.00	238.00
04/22/21	P.E. Breene	Work on PJ insurance companies document productions; Communications re same with Leveridge.	0.60	1,160.00	696.00
04/22/21	P.E. Breene	Draft discovery letter to K. Marrkand.	1.00	1,160.00	1,160.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/22/21	A. Kramer	email exchanges with RS briefing team re revisions to draft arbitration brief	0.40	1,190.00	476.00
04/22/21	M.J. Venditto	Review and revise draft of memorandum of law in opposition to motion to stay adversary proceeding in favor of arbitration	2.30	1,160.00	2,668.00
04/22/21	M.J. Venditto	Email correspondence with M. Auslander regarding eleven defendants' motions to stay or dismiss adversary proceeding	0.80	1,160.00	928.00
04/22/21	M.J. Venditto	telephone conversations (two) with Dorothy Li regarding hearing on defendants' motions	0.20	1,160.00	232.00
04/22/21	L.A. Szymanski	Review cases cited in Liberty's Motion to Stay in preparation for preparing Opposition to Same.	0.50	800.00	400.00
04/22/21	L.A. Szymanski	Analyze [REDACTED] [REDACTED] issue in Adversary Proceeding.	0.50	800.00	400.00
04/22/21	M.J. Venditto	Review and revise analysis of amended plan in joint memorandum of law in opposition to Liberty's motion to withdraw the reference	1.20	1,160.00	1,392.00
04/22/21	E. Y. Kim	Revise and proofread opposition brief to insurance companies' motion to stay in favor of arbitration per L. Szymanski's request.	1.20	535.00	642.00
04/22/21	E. F. Vieyra	Draft opposition to brief	0.80	540.00	432.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		joining in Liberty's motion to withdraw the reference.			
04/22/21	L.A. Szymanski	Attention to and analysis of joinder briefs in Liberty's Motion to Withdraw the Reference and allocation of responsibilities to drafting oppositions to same between L. Vieyra, A. Crawford & L. Szymanski.	1.00	800.00	800.00
04/22/21	L.A. Szymanski	Revise Opposition to Arbitration Insurers' Motion to Stay as per comments of A. Kramer, P. Breene.	5.50	800.00	4,400.00
04/22/21	P.E. Breene	Revise stay of arbitration brief	2.00	1,160.00	2,320.00
04/22/21	M.J. Venditto	Preparation of notice of hearing on elev defendants' motions	0.80	1,160.00	928.00
04/23/21	A. Kramer	Review/revise Kramer Declaration	3.70	1,190.00	4,403.00
04/23/21	E. F. Vieyra	Draft letter motion to district court requesting revised briefing schedule and related correspondence to defendants.	2.70	540.00	1,458.00
04/23/21	E. Y. Kim	Analyze policies at issue to draft Breene Declaration regarding opposition brief to motion to stay in favor of arbitration.	1.00	535.00	535.00
04/23/21	E. Y. Kim	Revise letter to K. Marrkand at Liberty regarding motion to withdraw reference.	0.40	535.00	214.00
04/23/21	A. Crawford	Begin draft opposition to Joinder motions.	1.10	650.00	715.00
04/23/21	L.A. Szymanski	Attention to filing Notice of	0.30	800.00	240.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		June 21 hearing.			
04/23/21	N. Sooy	Confer with L. Szymanski re status and strategy for briefing for oppositions to Motion to Withdraw the Reference, Motion regarding arbitration, and related Joinder filings.	0.40	380.00	152.00
04/23/21	A. Kramer	RS Team call re opposition briefing	0.50	1,190.00	595.00
04/23/21	L.A. Szymanski	Participate in conference call w/ A. Kramer, P. Breene, M. Venditto & A. Crawford re: addressing duplicative/joinder motions.	0.50	800.00	400.00
04/23/21	P.E. Breene	Team Call re briefing and strategy.	0.50	1,160.00	580.00
04/23/21	L.A. Szymanski	Attention to Joinder Motions to Withdraw Reference filed on District Court Docket.	0.50	800.00	400.00
04/23/21	M.J. Venditto	Review of motions and joinders filed on the District Court's docket	0.40	1,160.00	464.00
04/23/21	L.A. Szymanski	Communications w/ E. Kim re: Paul Breene Declaration ISO Opposition to Arbitration Insurers' Motion for a Stay.	0.40	800.00	320.00
04/23/21	M.J. Venditto	Participate in telephone conference call with A Kramer, P Breene, L Szymanski and A Crawford to discuss comments on draft of Opposition to the Motion to Withdraw the Reference	0.40	1,160.00	464.00
04/23/21	L.A. Szymanski	Communications w/ E. Kim re: revisions to Opposition to Motion to Stay in Favor of	0.40	800.00	320.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Arbitration.			
04/23/21	L.A. Szymanski	Email communications w/ A. Kramer, P. Breene, M. Venditto & A. Crawford re: addressing duplicative/joinder motions.	0.50	800.00	400.00
04/23/21	L.A. Szymanski	Communications w/ paraegal N. Sooy re: Breene Declaration to Opposition to Liberty's Motion to Withdraw Reference.	0.50	800.00	400.00
04/23/21	P.E. Breene	Review all "minor" briefs; Joinders, Liberty motion for a stay; TIG Lift Stay Motion.	1.00	1,160.00	1,160.00
04/23/21	M.J. Venditto	Review and comment on draft of memorandum of law in opposition to motion to dismiss for lack of jurisdiction over defendants	1.80	1,160.00	2,088.00
04/23/21	E. Y. Kim	Draft declaration of Paul Breene for opposition brief to defendant insurance companies' motion to stay in favor of arbitration.	2.50	535.00	1,337.50
04/23/21	N. Sooy	Revise into final and electronically file with Clerk of Court Notice of June 21 Hearing.	0.30	380.00	114.00
04/23/21	L.A. Szymanski	Revise letter to K. Markaand & insurers joining in motion to withdraw reference & letter to Judge Briccetti re: same.	2.30	800.00	1,840.00
04/24/21	A. Kramer	Review/revise Kramer Declaration	0.60	1,190.00	714.00
04/24/21	A. Crawford	Revise draft opposition to joinder motions.	2.50	650.00	1,625.00



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04/25/21	E. F. Vieyra	Revise letter motion to the district court.	0.80	540.00	432.00
04/25/21	E. F. Vieyra	Finalize letter to K. Markkand enclosing letter motion.	0.40	540.00	216.00
04/25/21	E. F. Vieyra	Correspondence with Moving Insurers re: Motion to Withdraw the Reference.	0.20	540.00	108.00
04/25/21	A. Crawford	Revise joinder motion oppositions.	2.60	650.00	1,690.00
04/25/21	L.A. Szymanski	Revise Objection to Motion to Withdraw Reference as per comments of UCC and Ad Hoc Committees.	0.80	800.00	640.00
04/25/21	L.A. Szymanski	Revise Breene Decl. ISO Objection to Liberty's Motion to Withdraw Reference and conform w/ brief.	1.00	800.00	800.00
04/25/21	L.A. Szymanski	Revise Oppn to Motion to Stay Pending Arbitration per comments of C. Ricarte and ensure comments from C. Ricarte, UCC and AHC to Obj. to Motion to Withdraw Reference are incorporated in Oppn to Motion to Stay Pending Arbitration.	2.20	800.00	1,760.00
04/25/21	L.A. Szymanski	Review and provide comments to joinder briefs to Motion to Withdraw Reference drafted by A. Crawford & L. Vieyra.	1.00	800.00	800.00
04/25/21	E. Y. Kim	Revise opposition brief to motion to stay in favor of arbitration per L. Szymanski's comments.	2.20	535.00	1,177.00
04/25/21	E. Y. Kim	Revise Paul Breene's declaration in support of	2.70	535.00	1,444.50



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Date	Timekeeper	Description	Hours	Rate	Amount
		opposition brief to motion to stay in favor of arbitration per L. Szymanski's comments.			
04/26/21	A. Kramer	Communications with C. Ricarte, M. Rush re Kramer Declaration	0.30	1,190.00	357.00
04/26/21	P. Hardy	with Catherine re [REDACTED] and requests for confirmation / review report to Ann Kramer re same	0.30	1,065.00	319.50
04/26/21	A. Kramer	Work with Breene, Szymanski, Venditto and Martin on personal jurisdiction and MTWR opposition briefs	1.80	1,190.00	2,142.00
04/26/21	E. Y. Kim	Draft Paul Breene's declaration for opposition brief to Liberty's stay motion per L. Szymanski's request.	0.90	535.00	481.50
04/26/21	A. Crawford	Revise joinder opposition briefs.	0.90	650.00	585.00
04/26/21	J.C. Martin	Review briefing on jurisdictional issue and cited cases and provide input on possible revised structure and approach for opposition.	2.50	1,320.00	3,300.00
04/26/21	J.C. Martin	Review briefing on arbitration motion and provide input on opposition.	0.90	1,320.00	1,188.00
04/26/21	E. F. Vieyra	Review and comment on draft opposition to motion to dismiss for lack of personal jurisdiction.	1.70	540.00	918.00
04/26/21	C. Lewis	Drafting summary of [REDACTED] and anticipated further steps for use in brief.	1.10	555.00	610.50



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04/26/21	S. B. Rhea	Review court's docket identify pleadings (ECF 2734-2737] requested by attorneys for review in anticipation of further case development.	0.70	290.00	203.00
04/26/21	E. F. Vieyra	Draft omnibus objection to joinder motions.	3.10	540.00	1,674.00
04/26/21	A. Kramer	Search for [REDACTED]	1.40	1,190.00	1,666.00
04/26/21	P.E. Breene	Call with Lisa S. re revisions to briefs and handling of joinder motions.	0.50	1,160.00	580.00
04/26/21	P.E. Breene	Correspondence with joinder insurance companies re proposed letter and draft scheduling order to Judge Briccetti	0.50	1,160.00	580.00
04/26/21	L.A. Szymanski	Review and provide comments on omnibus Opposition to Insurers' Personal Jurisdiction Motions.	6.90	800.00	5,520.00
04/26/21	S. DeMaris	SZYMANSKI-Secondary sources research: [REDACTED]	0.30	355.00	106.50
04/26/21	S. DeMaris	SZYMANSKI-Primary law research: [REDACTED]	0.30	355.00	106.50
04/26/21	M.J. Venditto	Email correspondence with P Breene and A Kramer regarding opposition to defendants' motions and joinders in motions to dismiss	0.20	1,160.00	232.00



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04/26/21	M.J. Venditto	Review and comment on AHC draft memorandum of law in opposition to motion to dismiss for lack of jurisdiction over defendants	2.50	1,160.00	2,900.00
04/26/21	P.E. Breene	Review Gilbert changes to Opposition to Motion to Withdraw reference.	1.00	1,160.00	1,160.00
04/26/21	E. Y. Kim	Legal research regarding [REDACTED] for opposition brief to Liberty's stay motion.	3.30	535.00	1,765.50
04/26/21	N. Sooy	Draft Objection/Opposition to Gulf Underwriters-St. Paul Joinder in Liberty Motion to Withdraw the Reference	0.40	380.00	152.00
04/26/21	N. Sooy	Draft Objection/Opposition to Navigators Joinder in Liberty Motion to Withdraw the Reference	0.40	380.00	152.00
04/26/21	E. Y. Kim	Draft, revise opposition brief to Liberty's stay motion per L. Szymanski's comments.	2.50	535.00	1,337.50
04/26/21	E. Y. Kim	Legal research regarding [REDACTED] for opposition brief to motion to withdraw reference.	1.10	535.00	588.50
04/26/21	E. F. Vieyra	Research to identify [REDACTED]	0.50	540.00	270.00
04/26/21	M.J. Venditto	Review and comment on draft email to C Ricci	0.10	1,160.00	116.00
04/26/21	L.A. Szymanski	Draft Opposition to Liberty's Motion for a Stay.	1.30	800.00	1,040.00



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04/26/21	M.J. Venditto	Review and comment draft declaration in opposition to defendants' motions to dismiss for lack of personal jurisdiction	0.80	1,160.00	928.00
04/27/21	A. Kramer	Telephone conversation with C. Ricarte re motions, open insurance issues	0.40	1,190.00	476.00
04/27/21	A. Kramer	email exchange with Massman and Kratzer re updating cites in opposition brief to amended Plan and Disclosure Statement	0.20	1,190.00	238.00
04/27/21	A. Kramer	Review/revise Kramer Declaration	0.40	1,190.00	476.00
04/27/21	A. Kramer	Revise briefs to add cites to amended Plan and Disclosure Statement	2.30	1,190.00	2,737.00
04/27/21	A. Kramer	email exchanges with Rush and Leveridge re Kramer Declaration and additional documents relevant to personal jurisdiction opposition	0.30	1,190.00	357.00
04/27/21	A. Crawford	Revise draft omnibus brief.	3.70	650.00	2,405.00
04/27/21	A. Kramer	Review/analyze Gilbert draft opposition to motion for more definite statement	0.20	1,190.00	238.00
04/27/21	J.C. Martin	Review, analyze, restructure and revise opposition to jurisdictional motions by overseas insurers and review USSCT cases on same.	6.40	1,320.00	8,448.00
04/27/21	A. Kramer	Conference call with RS Team re revisions to Opposition to MTWR brief	1.00	1,190.00	1,190.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/27/21	N. Sooy	Analyze communications between counsel to prepare updates to counsel list.	0.30	380.00	114.00
04/27/21	M.J. Venditto	Review of issues relating to sealing of confidential documents	0.60	1,160.00	696.00
04/27/21	M.J. Venditto	Review of legal research on [REDACTED]	0.40	1,160.00	464.00
04/27/21	E. F. Vieyra	Revise omnibus objection to joinder motions.	1.30	540.00	702.00
04/27/21	E. F. Vieyra	Revise omnibus opposition based on comment of A. Crawford.	1.60	540.00	864.00
04/27/21	S. B. Rhea	Finalize and submit letter motion to Judge Briccetti regarding extension of time to file Plaintiff's Opposition to all Motions to Withdraw the Reference in accordance with local rules.	0.80	290.00	232.00
04/27/21	E. Y. Kim	Analyze [REDACTED] for opposition brief to motion to withdraw reference.	0.70	535.00	374.50
04/27/21	P.E. Breene	Call with Kramer and J. Martin re revising Gilbert personal injury brief.	0.20	1,160.00	232.00
04/27/21	M.J. Venditto	Participate in telephone conference call with A Kramer, P Breene, L Szymanski and A Crawford to discuss revisions to the draft memorandum of law in opposition to motion to withdraw the reference	1.10	1,160.00	1,276.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/27/21	M.J. Venditto	Review and comment on draft of Consolidated Memorandum of Law in Opposition to Defendants' Motions for More Definite Statement	0.50	1,160.00	580.00
04/27/21	P.E. Breene	Team call re Gilbert edits to Motion To Withdraw Reference.	1.10	1,160.00	1,276.00
04/27/21	P.E. Breene	E-mails with J. Martin re revising Gilbert personal injury brief.	0.30	1,160.00	348.00
04/27/21	L.A. Szymanski	Call to discuss Gilbert edits to Oppn to Motion to Withdraw Reference.	1.10	800.00	880.00
04/27/21	L.A. Szymanski	Revise briefings and supplementary documents per comments of co-Plaintiffs, client & RS.	8.20	800.00	6,560.00
04/27/21	P.E. Breene	Review and revise Gilbert personal jurisdiction brief.	1.50	1,160.00	1,740.00
04/27/21	P.E. Breene	Review and revise Gilbert brief in opposition to Motions for more definite statement.	1.20	1,160.00	1,392.00
04/27/21	P.E. Breene	Revise Gilbert brief in opposition to Motions for more definite statement [REDACTED]; Check language with Lisa Szymanski and draft and send e-mail to Gilbert with revised brief.	0.50	1,160.00	580.00
04/27/21	E. Y. Kim	Follow up legal research regarding [REDACTED] [REDACTED] for opposition brief to motion to withdraw reference.	3.60	535.00	1,926.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/27/21	N. Sooy	Draft email text for Paul Breene to counsel re filing with the court .	0.30	380.00	114.00
04/27/21	E. Y. Kim	Legal research regarding [REDACTED] for opposition brief to motion to withdraw reference.	0.20	535.00	107.00
04/27/21	E. Y. Kim	Legal research regarding [REDACTED] for opposition brief to motion to withdraw reference.	0.80	535.00	428.00
04/27/21	M.J. Venditto	Review of comments and revisions from Ad Hoc Committee and Creditors' Committee to the draft memorandum of law in opposition to motion to withdraw the reference	1.50	1,160.00	1,740.00
04/28/21	A. Crawford	Revise objection to withdraw the reference and omnibus joinder objection.	3.00	650.00	1,950.00
04/28/21	A. Kramer	Review/revise Gilbert mark-up of Arbitration opposition	4.30	1,190.00	5,117.00
04/28/21	A. Kramer	Review/revise opposition to Motion to Withdraw the Reference and joinders	1.30	1,190.00	1,547.00
04/28/21	A. Kramer	Review/revise opposition to Personal Jurisdiction motion	1.10	1,190.00	1,309.00
04/28/21	J.C. Martin	Review, revise and analyze multiple drafts of opposition on jurisdictional motion and continued analysis of USSCT cases on same.	6.70	1,320.00	8,844.00
04/28/21	M.J. Venditto	Participate in telephone	0.50	1,160.00	580.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		conference call with A Kramer, P Breene, and P Singer to discuss litigation strategy			
04/28/21	M.J. Venditto	Draft litigation strategy agenda	0.30	1,160.00	348.00
04/28/21	E. Y. Kim	Follow up legal research regarding [REDACTED] [REDACTED] for opposition brief to motion to withdraw reference.	2.10	535.00	1,123.50
04/28/21	E. F. Vieyra	Research about [REDACTED] for arbitration brief.	2.20	540.00	1,188.00
04/28/21	E. F. Vieyra	Draft section of omnibus opposition about Arch motion.	1.50	540.00	810.00
04/28/21	P.E. Breene	Call with Kramer plus Gilbert, Dechert, Akin and Cole Schotts re briefing and other issues.	0.30	1,160.00	348.00
04/28/21	P.E. Breene	Review and revise Gilbert brief in opposition to Motion to dismiss on personal jurisdiction grounds; Calls with Kramer, Martin and Szymanski re same.	3.50	1,160.00	4,060.00
04/28/21	P.E. Breene	Review and revise Gilbert brief in opposition to Motion to withdraw reference; send revision to Committees.	1.00	1,160.00	1,160.00
04/28/21	P.E. Breene	Review and revise brief in opposition to joinder motions; Send same to Committees.	1.00	1,160.00	1,160.00
04/28/21	P.E. Breene	Review and revise brief in opposition to Liberty Stay motion; Send same to Committees.	0.70	1,160.00	812.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/28/21	P.E. Breene	Review Gilbert comments to arbitration brief.	0.50	1,160.00	580.00
04/28/21	L.A. Szymanski	Revise briefings and supplementary documents per comments of co-Plaintiffs, client & RS.	10.50	800.00	8,400.00
04/28/21	M.J. Venditto	Review and revise draft of Omnibus Opposition to Motions In Joinder to Liberty Mutual's Motion to Withdraw the Reference	0.70	1,160.00	812.00
04/28/21	M.J. Venditto	Review and comment on revised draft of brief opposition to Liberty Mutual's motion to stay adversary proceeding pending decision on motion to withdraw	1.30	1,160.00	1,508.00
04/28/21	M.J. Venditto	Review comments from Ad Hoc Committee on draft of Memorandum of Law in opposition to Arbitration Insurers' joint motion to stay adversary proceeding pending Arbitration	0.60	1,160.00	696.00
04/28/21	M.J. Venditto	Review arbitration defendants district court proceeding seeking partial withdrawal of adversary proceeding for determination of motion to stay	0.50	1,160.00	580.00
04/29/21	A. Kramer	address exhibits to RS briefs with C. Ricarte, K. Benedict, E. Vieyra	0.40	1,190.00	476.00
04/29/21	A. Crawford	Revise draft oppositions to joinder and withdrawal of the references briefs filed by various insurers.	6.80	650.00	4,420.00



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Date	Timekeeper	Description	Hours	Rate	Amount
04/29/21	J.C. Martin	Prepare notes on revisions to brief and review [REDACTED]	1.50	1,320.00	1,980.00
04/29/21	J.C. Martin	Prepare revised introduction to brief and draft inserts for background and summary of argument.	1.50	1,320.00	1,980.00
04/29/21	J.C. Martin	Prepare multiple redrafts of arbitration opposition and inserts.	3.20	1,320.00	4,224.00
04/29/21	A. Kramer	email exchanges with Gilbert and DPW teams re description of liabilities, confidentiality of exhibits for briefs	0.40	1,190.00	476.00
04/29/21	A. Kramer	Work on revisions to arbitration and personal jurisdiction briefs with RS, Gilbert and DPW teams	6.70	1,190.00	7,973.00
04/29/21	J.C. Martin	Review input from co-counsel on arbitration opposition and call with RS team on possible revisions to content of brief on same.	1.60	1,320.00	2,112.00
04/29/21	N. Sooy	Analyze file to pull exhibits for Breene Declaration in support of Opposition to Motion to Stay in Favor of Arbitration.	1.00	380.00	380.00
04/29/21	N. Sooy	Analyze file to pull exhibits for Breene declaration in support of Opposition to Motion to Withdraw Reference.	1.00	380.00	380.00
04/29/21	E. F. Vieyra	Review committees' proposed revisions to arbitration brief.	1.20	540.00	648.00
04/29/21	E. F. Vieyra	Case law research to assist J.	2.20	540.00	1,188.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Martin in drafting revisions to arbitration brief.			
04/29/21	E. F. Vieyra	RS Team call to discuss committees' proposed revisions to arbitration brief.	0.80	540.00	432.00
04/29/21	A. Kramer	Conference call with Breene, Venditto, Szymanski, Martin, Crawford and Vieyra re arbitration brief	0.70	1,190.00	833.00
04/29/21	S. DeMaris	SOOY-Secondary sources research: [REDACTED]	0.40	355.00	142.00
04/29/21	L.A. Szymanski	Call w/ RS team to discuss Gilbert edits to arbitration brief.	0.70	800.00	560.00
04/29/21	E. F. Vieyra	Review personal jurisdiction motion exhibits for personal identifiable information and redact.	1.80	540.00	972.00
04/29/21	E. Y. Kim	Gather and revise exhibits for opposition brief to motion to stay in favor of arbitration.	1.50	535.00	802.50
04/29/21	E. Y. Kim	Gather and revise exhibits for opposition brief to motion to withdraw reference.	2.60	535.00	1,391.00
04/29/21	E. Y. Kim	Revise opposition brief to motion to stay in favor of arbitration regarding defendant insurance companies and bankruptcy clauses.	1.90	535.00	1,016.50
04/29/21	E. Y. Kim	Revise opposition brief to motion to withdraw reference regarding joint standing stipulation.	1.10	535.00	588.50
04/29/21	N. Sooy	Draft Opposition to TIG-	0.40	380.00	152.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Ironshore Motion for Relief from Automatic Stay.			
04/29/21	M.J. Venditto	Review and comment on draft of Consolidated Opposition to Motions for More Definite Statement	0.50	1,160.00	580.00
04/29/21	P.E. Breene	Review and revise: Opposition to Liberty Motion to Withdraw Reference; Omnibus Brief in Opposition to Joinders in Liberty Withdraw Reference Brief, Opposition To Liberty Motion to Stay Adversary Proceeding, Opposition to Motion To Stay Adversary in favor of Arbitration, Opposition To TIG Lift Stay Motion, Gilbert Motion To Seal, Opposition to Motion To Dismiss on Personal Jurisdiction Grounds.	9.00	1,160.00	10,440.00
04/29/21	L.A. Szymanski	Revise briefings and supplementary documents per comments of co-Plaintiffs, client & RS.	13.30	800.00	10,640.00
04/29/21	M.J. Venditto	Participate in telephone conference call with J Martin, P Breene, A Kramer, A Crawford and L Szymanski to review comments and revisions on draft memorandum of law in opposition to Joint Insurer's Motion to Stay Adversary Proceeding	0.70	1,160.00	812.00
04/29/21	M.J. Venditto	Review and comment on draft response to motion by Arch seeking conditional	0.70	1,160.00	812.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		withdrawal of the reference on arbitrability issue			
04/29/21	M.J. Venditto	Review and comment on Martin's revisions to draft opposition to Insurers' Joint Motion to Stay the Claims against Them in Favor of Arbitration	0.80	1,160.00	928.00
04/29/21	M.J. Venditto	Prepare summary analysis of caselaw on [REDACTED] [REDACTED]	1.00	1,160.00	1,160.00
04/29/21	M.J. Venditto	Review revisions and comments from counsel for Ad Hoc Committee to draft of the opposition to defendants' motions for joinder in Liberty Mutual's motion to withdraw the reference	0.90	1,160.00	1,044.00
04/29/21	M.J. Venditto	Review legal research from Elizabeth Vieyra on core jurisdiction	0.40	1,160.00	464.00
04/29/21	M.J. Venditto	Review and comment on revised draft of the Opposition to Liberty's Motion to Stay in Favor of Arbitration	0.60	1,160.00	696.00
04/29/21	M.J. Venditto	Review and comment on revisions to draft of Plaintiffs' Memorandum of Law In Opposition to Arbitration Insurers' Joint Motion to Stay the Adversary Proceeding \	0.90	1,160.00	1,044.00
04/30/21	A. Kramer	email exchange with Ricarte, Hoff, Benedict, Breene and Vieyra re exhibits to personal jurisdiction motion	0.60	1,190.00	714.00
04/30/21	A. Kramer	email exchange with C. Troisi	0.20	1,190.00	238.00



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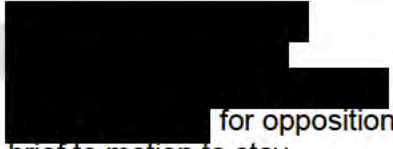
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Date	Timekeeper	Description	Hours	Rate	Amount
		(Marsh) re Marsh exhibits to personal jurisdiction motion			
04/30/21	A. Kramer	Review/revise opposition briefs	2.70	1,190.00	3,213.00
04/30/21	A. Kramer	Review/revise Kramer Declaration	0.40	1,190.00	476.00
04/30/21	A. Kramer	address exhibits to Gilbert PJ brief with M. Rush	2.10	1,190.00	2,499.00
04/30/21	A. Crawford	Revise draft oppositions to joinder and withdrawal of the references briefs filed by various insurers.	8.50	650.00	5,525.00
04/30/21	J.C. Martin	Review and analyze revised jurisdictional brief and provide further input on same.	0.80	1,320.00	1,056.00
04/30/21	E. F. Vieyra	Revisions to arbitration motion based on final comments from committees and client.	3.60	540.00	1,944.00
04/30/21	R.P. Lewis	Answering L. Szymanski question on [REDACTED]	0.10	1,100.00	110.00
04/30/21	D.P. Roberts	Prepare documents for attorney analysis per L. Szymanski's request.	1.10	425.00	467.50
04/30/21	A. Kramer	address exhibits to RS briefs with E. Vieyra	1.30	1,190.00	1,547.00
04/30/21	A. Kramer	Telephone conversation and email exchange with E. Vieyra re work flow and punchlist for exhibits to briefs	0.40	1,190.00	476.00
04/30/21	L.A. Szymanski	Participate in conference call w/ RS team re: to-do list for upcoming filings.	0.60	800.00	480.00
04/30/21	E. Y. Kim	Research [REDACTED]	0.90	535.00	481.50



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Date	Timekeeper	Description	Hours	Rate	Amount
		 for opposition brief to motion to stay arbitration.			
04/30/21	E. F. Vieyra	RS Team call to discuss tasks for finalizing and filing motions.	0.60	540.00	324.00
04/30/21	N. Sooy	Revisions to caselaw and record citations for Omnibus Opposition to Joinders to Liberty Motion to Withdraw the Reference.	3.00	380.00	1,140.00
04/30/21	N. Sooy	Revisions to Breene Declaration in support of Liberty Motion to Withdraw the Reference	1.60	380.00	608.00
04/30/21	E. Y. Kim	Revise declaration and exhibits for omnibus opposition brief to motion to withdraw reference.	3.60	535.00	1,926.00
04/30/21	E. Y. Kim	Revise declaration and exhibits for opposition brief to motion to stay in favor of arbitration.	3.20	535.00	1,712.00
04/30/21	E. F. Vieyra	Draft and implement work flow for review of exhibits.	1.80	540.00	972.00
04/30/21	L.A. Szymanski	Revise briefings and supplementary documents per comments of co-Plaintiffs, client & RS.	9.50	800.00	7,600.00
04/30/21	P.E. Breene	Review and revise: Opposition to Liberty Motion to Withdraw Reference; Omnibus Brief in Opposition to Joinders in Liberty	6.00	1,160.00	6,960.00



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Date	Timekeeper	Description	Hours	Rate	Amount
		Withdraw Reference Brief, Opposition To Liberty Motion to Stay Adversary Proceeding, Opposition to Motion To Stay Adversary in favor of Arbitration, Opposition To TIG Lift Stay Motion, Gilbert Motion To Seal, Opposition to Motion To Dismiss on Personal Jurisdiction Grounds.			
04/30/21	M.J. Venditto	Review and comment on draft of Debtors' Supplemental Opposition to Motion of Ironshore Specialty for Relief From the Automatic Stay	0.70	1,160.00	812.00
04/30/21	M.J. Venditto	Review and comment on draft of Plaintiffs' motion for an order authorizing plaintiffs to redact and file under seal defendants' documents designated as confidential	0.70	1,160.00	812.00
04/30/21	M.J. Venditto	Review and comment on revised draft of Plaintiffs' memorandum of law in opposition to the Insurers' joint motion to stay in favor of arbitration	1.50	1,160.00	1,740.00
Totals			753.80		626,420.00

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
James C. Martin	25.10 hrs @ \$	1,320.00 / hr	33,132.00
Ann V. Kramer	60.80 hrs @ \$	1,190.00 / hr	72,352.00
Paul E. Breene	87.50 hrs @ \$	1,160.00 / hr	101,500.00



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Timekeeper	Hours	Rate	Total
Michael J. Venditto	90.40 hrs @ \$	1,160.00 / hr	104,864.00
Richard Lewis	3.90 hrs @ \$	1,100.00 / hr	4,290.00
Peter Hardy	0.30 hrs @ \$	1,065.00 / hr	319.50
Lisa A. Szymanski	175.90 hrs @ \$	800.00 / hr	140,720.00
Anthony Crawford	102.20 hrs @ \$	650.00 / hr	66,430.00
Catherine Lewis	1.50 hrs @ \$	555.00 / hr	832.50
Elizabeth F. Vieyra	89.70 hrs @ \$	540.00 / hr	48,438.00
Esther Y. Kim	69.20 hrs @ \$	535.00 / hr	37,022.00
Dennis P. Roberts	1.10 hrs @ \$	425.00 / hr	467.50
Nora Sooy	28.80 hrs @ \$	380.00 / hr	10,944.00
Scott DeMaris	2.30 hrs @ \$	355.00 / hr	816.50
Shikendra B. Rhea	14.80 hrs @ \$	290.00 / hr	4,292.00
Total Professional Services			626,420.00

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
	Data Hosting Fee	75.88
	Duplicating/Printing/Scanning	351.00 @ 0.00 NO CHARGE
	ESI Data Filtering/ECA	54.78
	ESI Data Processing	258.16
	Secretarial Overtime	10.00
	Westlaw	NO CHARGE
03/15/2021	CitySprint UK Ltd - CITYSPRINT UK:395187.60004 14181 EC2 - SE15	14.11
03/24/2021	PAUL BREENE - Court - Other - VENDOR: Paul Breene, Mar 24, 2021, Purdue	70.00
03/24/2021	PAUL BREENE - Court - Other - VENDOR: Paul Breene, Mar 24, 2021, Purdue	70.00



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Date	Description	Amount
03/24/2021	MICHAEL VENDITTO - Court Costs - VENDOR: Michael Venditto, Mar 24, 2021, Telephonic Court Appearance 3/24/21	70.00
03/24/2021	ANN KRAMER - Court - Other - VENDOR: Ann Kramer, Mar 24, 2021, Court Appearance - Purdue	70.00
04/06/2021	United Parcel Service - 00843 UPS - Shipped from to L. SZYMANSKI LISA SZYMANSKI (GLENSIDE PA 19038) 1Z7332X60167728977	20.65
04/06/2021	United Parcel Service - 00843 UPS - Shipped from to E. VIERYA ELIZABETH VIEYRA (PHILADELPHIA PA 19119) 1Z7332X60167230969	20.65
04/06/2021	PAUL BREENE - Court - Other - VENDOR: Paul Breene, Apr 06, 2021, PURDUE	70.00
04/06/2021	MICHAEL VENDITTO - Court Costs - VENDOR: Michael Venditto, Apr 06, 2021, Telephonic Court Appearance 4/6/21	70.00
04/06/2021	ANN KRAMER - Court - Other - VENDOR: Ann Kramer, Apr 06, 2021, Court Appearance - Purdue	70.00
04/20/2021	United Parcel Service - 00843 UPS - Shipped from Paul Singer Reed Smith LLP - Pittsburgh to Paul Singer Paul Singer (ALLISON PARK PA 15101) Paul M. Singer 1Z2644280193232812	20.70
Total Expenses and Other Charges		964.93

INVOICE SUMMARY

Fees	\$ 626,420.00
Fee Discount - 17% Off Remaining Fees	\$ (79,291.40)
Fee Discount - 14% Off First \$160,000	\$ (22,400.00)
Total Fees	\$ 524,728.60
Total Expenses and Other Charges	\$ 964.93
TOTAL CURRENT INVOICE DUE	\$ 525,693.53
Total Amount Due	\$ 525,693.53